

PC200

Submitted by: Arne Hatch

Community of Residence: Seward, AK

As a lifelong resident of this state, I have seen the incredible benefits that salmon hatcheries have achieved for all user groups for more than a generation. I oppose adoption of proposals 170, 171 and 172 in any form. These proposals call for arbitrary actions affecting hatchery production without acceptable peer-reviewed scientific justification.

PC201

Submitted by: Billy Hayden

Community of Residence: HOMER

I AM STRONGLY OPPOSED TO PROPOSAL 183 AS WRITTEN. THIS WOULD REQUIRE ANGLERS TO RETAIN CARCASSES OF ALL SPECIES (OUTSIDE THOSE THAT CAN BE USED FOR BAIT) . IF EVERY RECREATIONAL AND CHARTER ANGLER ARE REQUIRED TO RETAIN AT A MINIMUM WHOLE CARCASSES WHEN RETURNING TO THE HARBOR THAT WILL CREATE A HUGE PROBLEM FOR THE HOMER HARBORMASTER AND CITY WORKS. THERE IS ALREADY NOT ENOUGH CARCASS BINS ON THE SPIT. THIS WOULD INCREASE CARCASS LITTER IN OUR HARBOR AS WELL. I RECOMMEND THE LANGUAGE OF PROP 183 BE CHANGED TO BETTER REFLECT THE INTENT OF ADFG. IF THE GOAL IS DATA COLLECTION I WOULD LIKE TO BRING UP THAT THERE IS ONLY 1 ADFG PORT SAMPLER FOR THE INTIRE HOMER HARBOR.

THANKS

PC201

Submitted by: Billy Hayden

Community of Residence: Homer

I am in support of proposal 176. I feel the intent of this proposal is misunderstood. The intent is to reduce release mortality. The charter fleet has size restrictions on several species of fish. We are forced by current regulation to release damaged fish based on an individual bag limit that could be retained under a cumulative bag limit. Used in this way proposal 176 is a conservation measure as well as a method to reduce wastage in our fishery. I would also mention that 5 ACC 75.995(a)(4) which defines "bag limit" applies to all anglers and not just fishermen on a chartered vessel. Thanks

PC202

Submitted by: Daniel Hayden

Community of Residence: Homer

I support proposal 176. As I guide, I often find myself releasing damaged and injured fish for fishermen that other fishermen would be happy to take. I think that this proposal would at least make it possible to retain these injured fish towards others bag limits. With the implementation of size limits, we have had to catch and release many more fish than in the past and I think it's time to change this law to accommodate the ever changing fishery.

I oppose proposal 183. I don't think Homer has the infrastructure to handle every fish carcass that is harvested each day. It would also be terribly inconvenient to keep whole fish and/or all carcasses onboard until docking. I also don't see the benefit of this proposal. If it is for law enforcement, then species should be easily identified with the laws in place now. If it is for research, then I would recommend having more than one port sampler before creating this huge mess that is proposed.

PC203

Submitted by: Ole Haynes
SE SEINER.

Community of Residence: Ketchikan

As a 4th generation, born and raised, lifelong Alaskan, for the sustainability of my family and salmon fishing livelihood, we strongly oppose proposals 170,171 and 172. The survival and livelihood of my family, of which my 4 sons fish onboard my SE salmon seiner, we **DEPEND** heavily (**AT LEAST 50-75%**) upon the chum hatcheries for survival and living. We strongly oppose proposals 170,171 and 172. Thank you very much for listening and caring about your fellow Alaskan families and communities. Sincerely, Ole Haynes family.

F/V Evie Grace ~ Evie Grace Fisheries LLC
F/V Pacific Star ~ PacStar, Inc.



March 2, 2026

Alaska Board of Fisheries
 Alaska Department of Fish and Game
 PO Box 115526
 Anchorage, AK 99811-5526

RE: Oppose Proposal 11; Proposals 163, 164, 165; Proposals 170, 171, 172

Dear Chairwoman Carlson-Van-Dort and Board Members,

For 47 years, we have chosen Kodiak as our home, raising our four children here while owning several trawl and longline vessels over the years. Currently, our family owns and actively fishes two 79' vessels in Federal and State waters. Our son, daughters and grandchildren are also active participants in these endeavors. My father and grandfather Bristol Bay salmon fishers; as a family, we've also spent several years as part of a setnet crew in beautiful Moser/Olga Bay. I have owned a Kodiak tanner permit for several years. We currently tender salmon in PWS, SE Alaska and Bristol Bay -wherever needed. We realize and appreciate the importance of salmon to Alaska and to our operating plan.

For at least 10 months of the year, our crew of about 10-15 individuals work hard to be successful. Over the last 20 years, the Pacific Star has employed 98 fishers with 87 of them being Alaskan residents. Over those years they have supported about 350 family members who in turn support and contribute to our Kodiak and Alaskan communities.

I am strongly opposed to proposals 11, 163-165 and 170-172

For some of the reasons listed below, I am opposed to Proposal 11 which is seeking to close state water fisheries in the Adak area to Trawl. Fishing within three nautical miles of Adak is imperative to the safety of the vessels in this fishery. Closing these waters on non-science-based information and emotions is a scare tactic that impedes progress and knowledge in all fisheries.

Proposals 163-165

During A season, we choose to fish in PWS to avoid salmon and to ensure the fishery is maintained in a sustainable manner. When fishing around Kodiak, staying inside three nautical miles of Kodiak is important to us to avoid weather, keeping the crew safe while being close to town, using less fuel.

Continued Comments to Board of Fish RE: Proposal 11, Proposals 163-165, Proposals 170-172

Proposals 163-165 are outside the Board's authority as written and not developed by informed stakeholders, creating a significant expense for the State. Trawl fishing occurs in less than 1% of all state waters. In the Gulf of Alaska where we operate, if we're fishing on the bottom in rocky habitat our nets are shredded. Needless to say, the cost of one cod-end and net tore up on rough bottom is an unproductive way to operate and should be avoided at all costs.

We are invested in improving monitoring and our understanding of how trawl gear operates. We have participated in Trawl Electronic Monitoring since 2020 with cameras on for 100% of my pelagic pollock trips. We are also voluntarily participating in the Gear Innovative Initiative, where researchers from Alaska Pacific University are using our net plans, specifications of all aspects of our pelagic trawl gear and information collected in interviews about how we fish the gear to model exactly how the gear functions in the water column, which will eventually be compared to field trials. This will update our current estimates of bottom contact which are only educated guesses right now, to accurate data points based on scientific evidence. This work is also incorporated into the North Pacific Fishery Management Council's process, will be peer-reviewed by their Science and Statistical committee and used to update the Fishing Effects model in the Essential Fish Habitat 5-year review required under the MSA. *All of this work is part of a public and transparent process that our fishery has embraced for more education and to keep our fishery sustainable.*

While I oppose Proposal 165 because it is outside of the Board's authority and because the State lacks a mechanism for monitoring and enforcing exclude use, I already use a salmon excluder when fishing. I have been a strong proponent of excluders for more than 20 years and have made prototypes for trial-and-error testing over the years.

Proposals 170, 171, and 172 are misguided and a threat to our coastal communities that rely on salmon fisheries. Hatchery permitting and scientific oversight should stay with ADF&G, who are the experts in managing towards our salmon policies.

We depend on the accuracy of managing the salmon fishery to move forward with our business model. As a Board, it is your responsibility to ensure that all Alaskans continue to benefit; please don't take action that threatens that.

Please do not act on Proposal 11, Proposals 163-165 and Proposals 171-172.

Thank you for the opportunity to comment.

Kent Helligso

Kent Helligso, owner

Colleen Helligso

Colleen Helligso, owner

Alaska Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
Anchorage, AK 99811-5526

Re: Oppose Proposals 11,163,164 and 165 (trawl)

Support Proposals 166,167,168 (jig)

Dear Chairwoman Carlson-Van Dort and Board Members,

Hello my name is Mike Helligso. I am a life long Kodiak resident and commercial/subsistence/sport fisherman. I started commercial fishing at an early age, in the 90s and have participated in various state and federal Alaskan fisheries through the years including trawl fisheries, salmon, crab and halibut. I love living, working and raising our kids in Alaska, especially in a small tight knit coastal community. Kodiak, like many coastal towns depends on a healthy fishing industry and I've always taken pride in not just being a positive contributor to the community but also making sure future generations of fishers have the opportunities I did.

Proposals 11,163,164 & 165

I'm writing in opposition of these proposals as they were developed by uninformed folks, based on speculation and with no outreach to stakeholders in the industry for validation. Trawl fishing occurs in less than 1% of state waters with the majority of that done by pelagic pollock fisheries. Very little non pelagic trawling is done in state waters and accounts for minimal impact. Out by Adak the bottom trawl cod fishery got Adak on the map as a legitimate processing market that would not have happened otherwise. In SE a handful of small vessels trawl for shrimp, that go into local markets and have no adverse issues on habitat or marine stocks.

Pollock fishing in state waters is essential to the communities of Kodiak and Sand Point. They also supported the communities Cordova, Seward and King Cove. Besides having the PWS pollock fishery, quite a bit of the federal pollock take happens inside state waters which is critical for keeping our coastal communities going. These proposals cite reports made to the NPFMC that stated that pelagic gear makes quite a bit of contact with the bottom. What they don't mention is that those studies were mainly in the bearing sea and that amount of bottom contact doesn't apply to the Gulf. Pollock fishing in the Gulf is vastly different compared to out west. I remember when Salmon State tried arguing at the '24 BOF meetings in Cordova that pelagic trawls in the Gulf were on the bottom 0-35% of the time but it was pointed out that what that study showed was that 0-35% of the pelagic gear makes contact with the bottom when contact is made...not how much time is spent on the bottom. Studies are good info but must be represent in the correct context to come to accurate conclusions.....misrepresentation of analysis is disingenuous. The Gulf waters are vastly deeper and more rugged with fish behaving to them accordingly. The same is true for inside state waters in the Gulf. Pollock don't like to go very deep and are very much up in the midwater in the Gulf. Deep waters and rugged terrain make it challenging to catch fish up in the water column and down right implausible to successfully catch fish on the bottom with pelagic gear. I'd say that pelagic gear makes contact with the bottom in the Gulf under 5% of the time. I'm grateful the Alaska Pacific University is undertaking the highly involved study of examining pelagic trawl gear, how it's being used and

the impacts it may have throughout the state. I look forward to having that information available so folks can have good data to look at and work with. Studies show that pollock in state waters feed quite a bit on juvenile salmon smolts leaving the rivers and beginning their journeys in the ocean. People have seen and testified that removing pollock from areas where salmon smolts empty in the sea are a good thing for salmon runs.

Even disregarding the process and finances of setting up and enforcing bottom contact verification by the state for trawl fisheries for say bottom contact sensors, the accuracy of the reporting varies wildly and is by no means fool proof. These sensors are not widely used in the US but in international fisheries with vendors stating that bottom contact affirmation or lack there of is subjective and not linear with what is always happening with the trawls.

Unlike what is stated in the proposal, bycatch caps do standardize enforceable protections for salmon stocks. The state has no mandated genetic testing for salmon caught in trawl fisheries to verify claims that salmon bycatch is mostly small out of state/county hatchery fish. All trawlers have salmon excluders but performance is not static across all designs and is specifically unique to individual vessels. While there are various designs, performance is not just based on the make and model but also vessel and gear configuration. Water flow through excluders is a critical factor in bycatch to target species escapement ratio. Many folks have modified their excluders for optimal performance due to vessel size, gear configuration and fishing depths. Having a concrete definition may not optimize and perhaps hinder performance.

Proposals 166,167,168

The jig fishery is a very special fishery for the small time operators that rely on it. For many it's the only income they have before the summer months. A lot of the vessels are not big enough to safely participate in other fisheries this time of year. The jig fishery has gotten more participation from outside vessels, vessels that do participate in other fisheries and have made some money before getting into jig. Suspicious gear configurations along with reported sightings and landing details have led to us to where these proposals are becoming necessary to confirm the fishery is on a level playing field. Heck I'm not even involved in the jig fishery and the landings and behavior I've seen that are reported as "jig" do not fall in line with the parameters of what legitimate jig operations produce. I support the definitions in these proposals to help curtail the recent shenanigans that are directly effecting small time local operators.

In closing I feel that it is very important to have collaboration and conversations on issues effecting our state and the people in it but these proposals (163-165) were made by people, based not on merit but emotion, with a certain unawareness for the particulars of the fishery. I would like to see all fisheries thrive for generations and knocking down successful, sustainable ones that also benefit other fisheries isn't the way.

Thank you for you time.

Sincerely,

Mike Helligso

Submitted by: Ron Henry

Community of Residence: Ketchikan

Seiner for 50 years

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is James Herbert, and I am a retired commercial fisherman and local business owner. I am also a sport fisherman and personal use harvester based in Homer and Southcentral Alaska. I fished aboard the FV Kingfisher III.

I am retired now, but I had a meaningful career as a commercial salmon fisherman in various parts of the state. Without the stabilizing effect of hatcheries, I feel my financial success would have been much more uncertain. Different regions depend more or less on hatchery fish, but hatcheries are a vital part of economic stability for the salmon industry. I want current and future fishermen and women to have a viable livelihood, and I see hatcheries as part of that vision.

Many of my friends and neighbors are commercial fishermen in Prince William Sound, Kodiak, and lower Cook Inlet. Their contributions to the local economy are significant and are linked in part to stable salmon fisheries facilitated by hatcheries. Tourism is also dependent on these fish to enhance wild runs.

I believe in science to make decisions. The natural world is a complex system, and it is difficult to parse out cause and effect. While salmon are among the best monitored species, what happens to them in the open ocean is still uncertain. When biologists make predictions, there are no guarantees, which is why we see boom or bust years with both hatchery and natural returns. Good science takes time and money, and it should not be supplanted with irrational arguments and bogus theories.

In our current political climate, powerful interests often act without considering consequences to people, the economy, and trust in the process. Though I tend to be an impatient person, I believe in deliberative processes. We must trust decision makers to follow the rules and procedures.

The world we live in in 2026 is very different from the one I started fishing in in 1971. I am distressed by the lack of attention to humanity's negative effects on global temperatures and habitat loss. Alaska is blessed with many positives that make quality seafood available to the nation. Ultimately, some problems that plague the Yukon and Kuskokwim Rivers may come to other regions. We need science to understand and anticipate these effects.

Salmon hatcheries are a small part of the larger salmon and commercial and sportfishing industry, but they provide stability, offer predictability, and help sustain fishing and local economies. We need them.

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

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

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

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

Sincerely,

JAMES HERBERT
Homer/south central AK, Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Cale Herschleb, and I am a salmon seine fisherman based in Cordova, Alaska. I fish aboard the F/V Celtic Lady.

I grew up seining on my dad's boat and have had my own boat for 15 years. My children are just reaching the age where they can go out on the boat. If hatchery production were to go away, my kids would lose the opportunity to continue our way of life, and my boat and permit, which are the only assets I own free and clear, would lose much of their value. My income would drop dramatically, and I would be forced to uproot our family of five to seek employment and a lower cost of living.

Our town of Cordova is already suffering from budget shortfalls from a 2024 pink salmon disaster. If the hatcheries stop producing fish, this remote community would likely suffer severe economic decline. Racing ahead of the science is never a good idea. A plan to reduce hatchery output without a plan to buy back permits and/or boats would invite serious legal and economic consequences for fishermen and communities invested in this industry.

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

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

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,

Cale Herschleb
Cordova, Alaska



Submitted by: Nancy Hillstrand

Community of Residence: Kachemak Bay

PROPOSAL 171 – 5 AAC 40.XXX New Regulation.

PROPOSED BY: Kenai River Sportfishing Association.

WHAT WOULD THE PROPOSAL DO?

Proposal 171 Create a Policy for Reasonable Segregation required in the PNP Hatchery Act.

This regulatory mechanism using Chapter 39 allows opportunity to fulfill the mandated regulatory “Policy of Reasonable Segregation” asked for in the original PNP Hatchery Act. This policy will align ADFG and hatchery operators mandated responsibility that “hatchery programs shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks.”

This overlooked yet mandated Policy of Reasonable Segregation was asked for 50 years ago. PWS hatchery fish inter-regionally straying from 250 miles of release into Lower Cook Inlet has been brought before the board many times since 2017. Documentation in 2014 of magnitude 88% PWS Inter-regional straying into a significant stock called Barabara Creek is not condoned in the Genetics Policy. When monitoring occurs, straying is found. This is evident not only in Lower Cook Inlet but now in SEAKs Northern Outside District, resulting in stocks of concern. A structured mechanism to provide Action plans and implementation is needed to remedy recognized detrimental effects of straying on wild stocks and to fulfill the legislative mandate for hatcheries to operate without adversely affecting natural stocks of fish and under a policy of reasonable segregation.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The policy of reasonable segregation elevates management to a higher standard giving structure for ADFG and the board to proudly manage for “...utilization, development, and conservation of all natural resources belonging to the State.” Taking action to create this mandated Policy brings consistency with Alaska’s specific statutes, regulations, and policies designed specifically to protect our natural resources belonging to the State.

Creating a structured policy will break the nasty habit of denial and kicking the can down the road on hatchery straying using the weight of science and best available information.

Presently the straying problem has no management, no protection for wild fish from straying, just turning the blind eye to an adverse effect resulting in stocks of concern as seen in the NSEO District Chum Status Report and Action Plan submitted to the BOF January 2025. Before more damage is allowed to continue a policy can begin to address this long overdue problem brings consistency aligned with the Alaska constitution

WHAT COULD BE INCLUDED IN A POLICY OF REASONABLE SEGREGATION

It would consider the best interest of all 700,000 Alaskan public stakeholders of the wild fish resources. It would create the mandated policy of reasonable segregation based on defensible best available information giving structure to sustainably manage salmon using the sustainable salmon policy directives and the precautionary approach.

A Policy of reasonable Segregation can include:

1. clear definition of scientifically defended reasonable proportions of hatchery strays permitted to segregate in wild systems proven to not adversely affect wild fish.
2. Clearly define what hatchery proportions are unreasonable adversely affecting wild fish requiring hatchery operator action.

3. Require Hatcheries to pay for annual assessment of the extent of PWS hatchery-produced pink salmon present in Cook Inlet streams. Without monitoring, the condition of otolith marking fry has no efficacy.
4. Hatchery permits are "subject to the restrictions imposed by statute or regulation." AS 16.10.400(a).
5. Require otolith reading in an independent lab;
6. hatchery operators required to defend proof of no harm on any proportions above 2% hatchery strays found in wild river systems;
7. hatchery operators will detail what best available information or fish culture remedy is recommended to halt unreasonable proportions of their hatchery fish in wild river systems.
8. Hatchery operators will implement an Action Plan with goals and alternatives that aligns with the best available information and the precautionary approach to provide protection of wild fish until these proportions are brought back in check to what is considered reasonable segregation as defined.

WHAT ARE THE CURRENT REGULATIONS AND POLICIES GOVERNING PROTECTION OF WILD FISH FROM HATCHERY PERMITS AND STRAYING?

<https://www.akleg.gov/basis/statutes.asp#16.05.730>

Sec. 16.05.730. Management of wild and enhanced stocks of fish. (a) Fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks.

Sec. 16.10.440. Regulations relating to released fish.

Sec 16.05.251 Board of Fisheries Regulations

(7) watershed and habitat improvement, and management, conservation, protection, use, disposal, propagation, and stocking of fish;

(8) investigating and determining the extent and effect of disease, predation, and competition among fish in the state, exercising control measures considered necessary to the resources of the state;

(9) prohibiting and regulating the live capture, possession, transport, or release of native or exotic fish or their eggs;

(12) regulating commercial, sport, guided sport, subsistence, and personal use fishing as needed for the conservation, development, and utilization of fisheries;

5 AAC 39.220. Policy for the management of mixed stock salmon fisheries.

5 AAC 39.222. Policy for the management of sustainable salmon fisheries.

5 AAC 39.223. Policy for statewide salmon escapement goals.

"5 AAC 39.224 Policy for reasonable segregation"

<http://www.adfg.alaska.gov/FedAidPDFs/FRED.GeneticsPolicy.1985.pdf>

Alaska Department of Fish & Game GENETIC POLICY

Page 1 POLICY STATEMENT on I. Stock transport:

A. Inter-regional: Stocks will not be transported between major geographic areas: Southeast, Kodiak Island, Prince William Sound, Cook Inlet, Bristol Bay, AYK and Interior.

Page 2 - II. PROTECTION OF WILD STOCKS

A. Gene flow from hatchery fish straying and intermingling with wild stocks may have

significant detrimental effects on wild stocks. First priority will be given to protection of wild stocks from possible harmful interactions with introduced stocks. Stocks cannot be introduced to sites where the introduced stock may have significant interaction or impact on significant or unique wild stocks.

The precautionary approach is warranted.

Thank you for your attention

Sincerely

Nancy Hillstrand



PROPOSAL 171 – 5 AAC 40.XXX New Regulation.

PROPOSED BY: Kenai River Sportfishing Association.

WHAT WOULD THE PROPOSAL DO?

Proposal 171 Creates a mechanism under Chapter 39 for opportunity to fulfill the mandated regulatory “Policy of Reasonable Segregation asked for in the original PNP Hatchery Act. This policy will align ADFG and hatchery operators mandated responsibility that “hatchery programs shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks.”

This overlooked yet mandated **Policy of Reasonable Segregation** was asked for 50 years ago. PWS hatchery fish inter-regionally straying from 250 miles of release into Lower Cook Inlet has been brought before the board since 2017. Documentation of magnitude 88% PWS Inter-regional straying into a significant stock called Barabara Creek is not condoned in the Genetics Policy. When monitoring occurs, straying is found. This is evident not only in Lower Cook Inlet but now in SEAKs Northern Outside District, resulting in stocks of concern. A structured mechanism to provide Action plans and implementation is needed to remedy recognized detrimental effects of straying on wild stocks and to fulfill the legislative mandate for hatcheries to operate without adversely affecting natural stocks of fish and under a policy of reasonable segregation.

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The policy of reasonable segregation elevates management to a higher standard giving structure for ADFG and the board to proudly manage for “...utilization, development, and conservation of all natural resources belonging to the State.” Taking action to create this mandated Policy brings consistency with Alaska’s specific statutes, regulations, and policies designed specifically to protect our natural resources belonging to the State.

Creating a structured policy will break the nasty habit of denial and kicking the can down the road on hatchery straying using the weight of science and best available information.

Presently the straying problem has no management, no protection for wild fish from straying, just turning the blind eye to an adverse effect resulting in stocks of concern as seen in the NSEO District Chum Status Report and Action Plan submitted to the BOF January 2025. Before more damage is allowed to continue a policy can begin to address this long overdue problem brings consistency aligned with the Alaska constitution

WHAT COULD BE INCLUDED IN A POLICY OF REASONABLE SEGREGATION

It would consider the best interest of all 700,000 Alaskan public stakeholders of the wild fish resources. It would create the mandated policy of reasonable segregation based on defensible best available information giving structure to sustainably manage salmon using the sustainable salmon policy directives and the precautionary approach.

A Policy of reasonable Segregation can include:

1. clear definition of scientifically defended reasonable proportions of hatchery strays permitted to segregate in wild systems proven to not adversely affect wild fish.
2. Clearly define what hatchery proportions are unreasonable adversely affecting wild fish requiring hatchery operator action.
3. Require Hatcheries to pay for annual assessment of the extent of PWS hatchery-produced pink salmon present in Cook Inlet streams. Without monitoring, the condition of otolith marking fry has no efficacy.
4. Hatchery permits are "subject to the restrictions imposed by statute or regulation." AS 16.10.400(a).
5. Require otolith reading in an independent lab;
6. hatchery operators required to defend proof of no harm on any proportions above 2% hatchery strays found in wild river systems;
7. hatchery operators will detail what best available information or fish culture remedy is recommended to halt unreasonable proportions of their hatchery fish in wild river systems.
8. Hatchery operators will implement an Action Plan with goals and alternatives that aligns with the best available information and the precautionary approach to provide protection of wild fish until these proportions are brought back in check to what is considered reasonable segregation as defined.

WHAT ARE THE CURRENT REGULATIONS AND POLICIES GOVERNING PROTECTION OF WILD FISH FROM HATCHERY PERMITS AND STRAYING?

<https://www.akleg.gov/basis/statutes.asp#16.05.730>

Sec. 16.05.730. Management of wild and enhanced stocks of fish. (a) Fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks.

Sec. 16.10.440. Regulations relating to released fish.

Sec 16.05.251 Board of Fisheries Regulations

(7) watershed and habitat improvement, and management, *conservation, protection, use, disposal, propagation, and stocking of fish*;

(8) investigating and determining the extent and effect of disease, predation, and competition among fish in the state, *exercising control measures considered necessary to the resources of the state*;

(9) *prohibiting and regulating the live capture, possession, transport, or release of native or exotic fish or their eggs*;

(12) *regulating commercial, sport, guided sport, subsistence, and personal use fishing as needed for the conservation, development, and utilization of fisheries*;

[5 AAC 39.220. Policy for the management of mixed stock salmon fisheries.](#)

[5 AAC 39.222. Policy for the management of sustainable salmon fisheries.](#)

[5 AAC 39.223. Policy for statewide salmon escapement goals.](#)

5 AAC 39.224 Policy for reasonable segregation

<http://www.adfg.alaska.gov/FedAidPDFs/FRED.GeneticsPolicy.1985.pdf>

Alaska Department of Fish & Game GENETIC POLICY

Page 1 POLICY STATEMENT on I. Stock transport:

- A. **Inter-regional:** Stocks will not be transported between major geographic areas: Southeast, Kodiak Island, *Prince William Sound, Cook Inlet*, Bristol Bay, AYK and Interior.

Page 2 - II. PROTECTION OF WILD STOCKS

A. Gene flow from hatchery fish straying and intermingling with wild stocks may have significant detrimental effects on wild stocks. **First priority will be given to protection of wild stocks from possible harmful interactions with introduced stocks.** Stocks cannot be introduced to sites where the introduced stock may have significant interaction or impact on significant or unique wild stocks.

The precautionary approach is warranted.

Thank you for your attention

Sincerely

Nancy Hillstrand



Comments on Proposal #11 for the March 2026 Statewide Board Meeting

My name is John Hilsinger. I live in Anchorage Alaska. I retired from ADF&G in 2010 after 38 years doing research and management of shellfish, groundfish, salmon, and herring all over Alaska. My last four years with the department were spent as the statewide Director of Commercial Fisheries Division. Since 2013, I have worked as a consultant advising golden king crab fishermen in the Aleutian Islands.

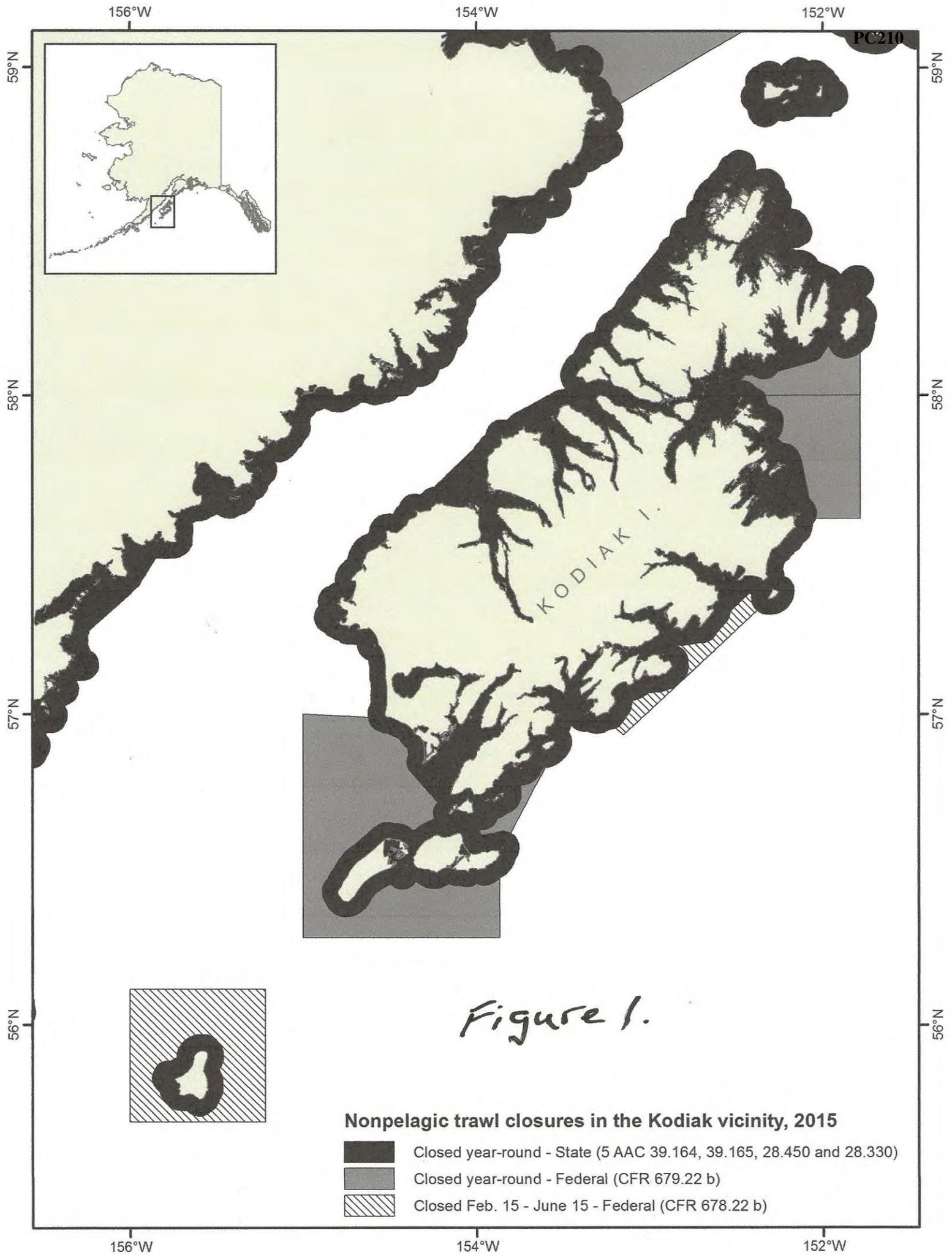
I am writing in support of Proposal #11, which would close groundfish trawling inside state waters west of 170° W. long in the Aleutian Islands. This proposal is primarily designed to protect golden king crab habitat from factory trawlers. In recent years, these vessels have increased their activity on golden king crab habitat, including areas where females and sub-legal crab are concentrated. Fishing by these vessels in golden king crab areas has increased since the relaxation of closures aimed at protecting Steller sea lions and is concurrent with substantial declines in the health of the golden king crab stock. After decades of stable harvest levels, the golden king crab stock in the western Aleutians (WAG) area has declined dramatically.

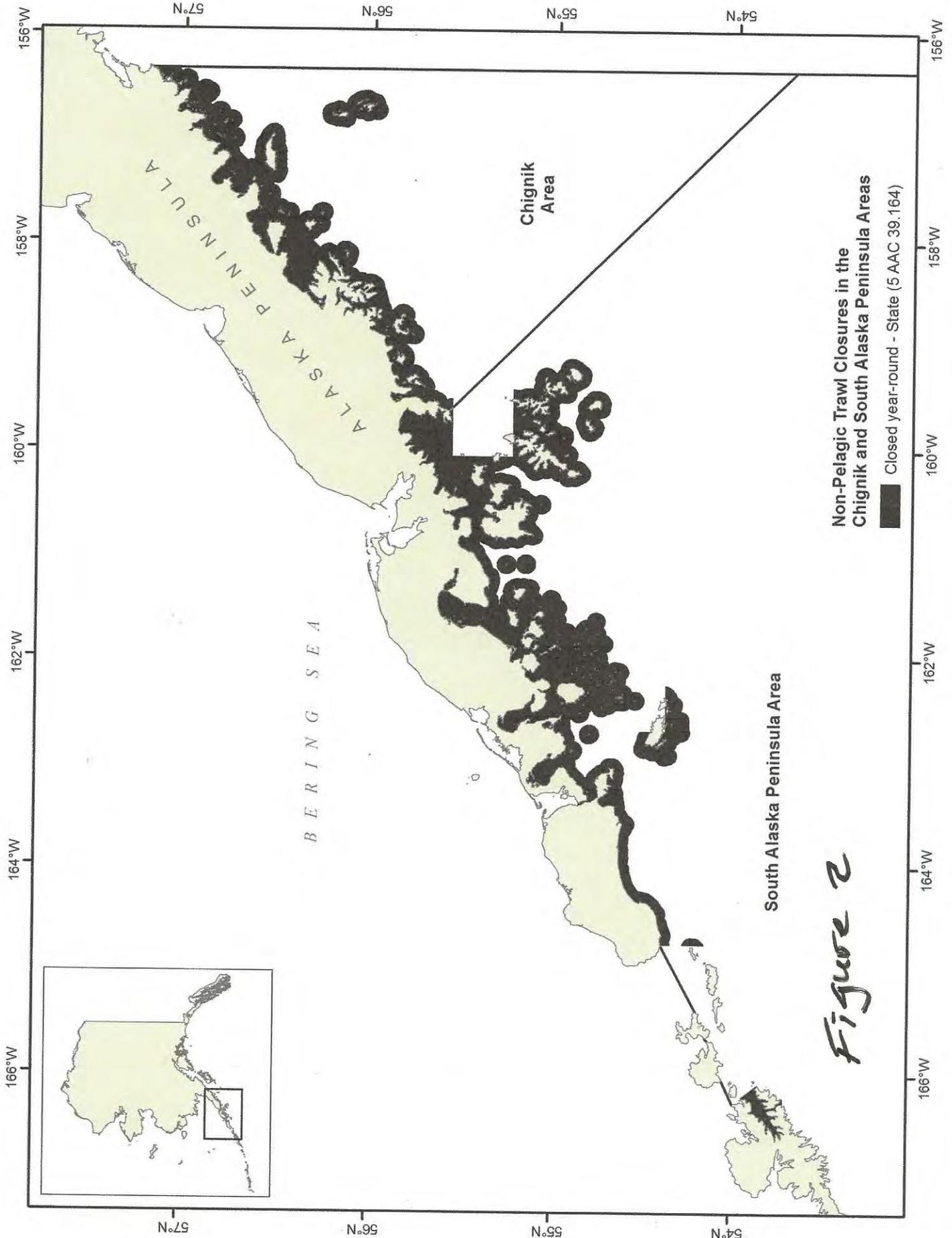
Habitat concerns have been brought to the attention of the North Pacific Fishery Management Council (NPFMC) Crab Plan Team (CPT) and Scientific & Statistical Committee (SSC). Trawl restrictions to protect Steller sea lions are very complex, but appear to have gone into effect in about 1991 and were relaxed in 2014. In September 2016, the Aleutian King Crab Research Foundation presented information to the CPT demonstrating that intensive trawling was occurring in areas where 88% of the golden king crab were being caught. The CPT recommended full analysis to understand the causes of reduced king crab catch rates, and whether changes in catch rates could negatively impact stock assessment. Further they recommended the analysis account for impacts to habitat as well as bycatch of golden king crab. It was recommended this work be done as a component or extension of the Essential Fish Habitat analysis. Last year, the SSC has also recommended the need for this research following testimony expressing concern about the dramatic decline in golden king crab in the WAG and the impacts to crab behavior following trawling in an area. An important question is what does trawling do to golden king crab prey species. Golden king crab eat a wide assortment of marine life including worms, clams, mussels, snails, brittle stars, sea stars, sea urchins, sand dollars, barnacles, crabs, other crustaceans, fish parts, sponges, and algae. All these species have limited ability to protect themselves from trawls.

We know that trawling continues to occur on prime golden king crab habitat because trawlers are pre-empting prime golden king crab fishing grounds and causing loss of crab gear. There are also concerns for habitat occupied by female and sublegal male golden crab, which inhabit different grounds from the legal males. The NPFMC 's number two research priority is to quantify the impacts of fishing gear on crab and their associated benthic habitat. Priority seven is to better understand spatial distribution, habitat requirements, and movement of crabs relative to life history events and fishing

These are not simple issues to address. A major problem with acquiring information on adverse impacts to golden king crab areas is that the activity is taking place in very remote areas and extremely deep water and there is little documentation regarding the destructive nature of a trawl being dragged across golden king crab habitat. Given the significant decline in golden king crab stocks in the WAG area, it is imperative to exercise caution and be conservative in managing trawl gear until research demonstrates trawling can be done safely and without conflicts with pre-existing fixed gear.

This issue has already been addressed for much of state waters. As shown in the attached charts, all the state waters around Kodiak Island are currently closed to non-pelagic trawls (Figure 1) as are the waters of the Chignik and South Peninsula areas (Figure 2), and the waters of the Bristol Bay and Bering Sea coast (Figure 3). The Aleutian Islands state waters area should be brought under the same protection.





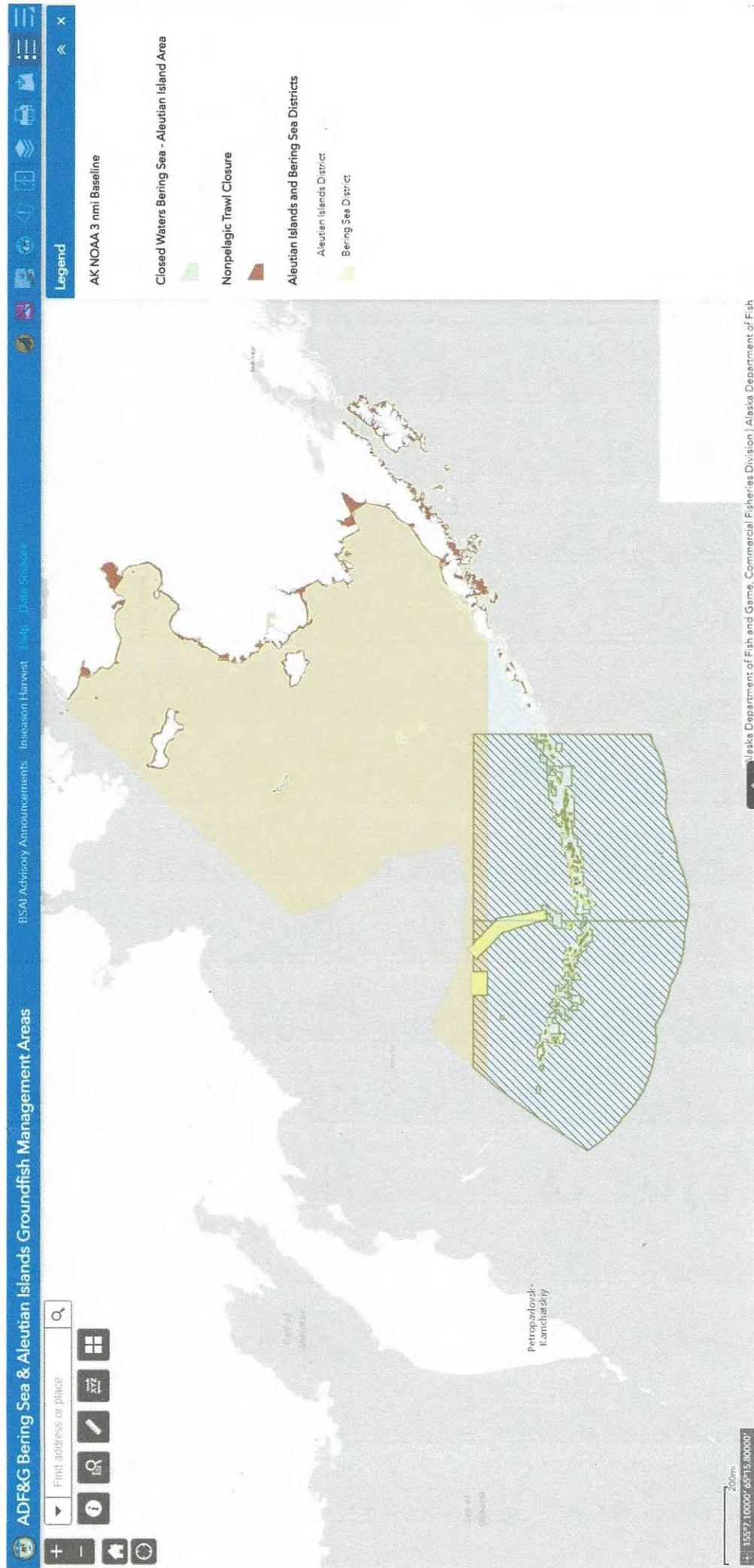


Figure 3

Submitted by: David Hilty

Community of Residence: Kodiak

Re: OPPOSITION to Proposals 170,171,172 (Pink and Chum Hatchery Cuts)

Dear Chair Carlson-Van Dort and Members of the Board.

My name is David Hilty, I have been a resident of Kodiak for the past 50 years.

I OPPOSE Proposals 170,171,172.

If a 25% reduction of egg take and production is implemented it could effectively financially bankrupt many of the salmon hatcheries in the state. These hatcheries operate on very thin margins and with today's increased costs they depend largely on cost recovery fishing for a large portion of their income to balance their books. It would drastically reduce the amount of fish available to common property fishing.

I fear that if any reduction of hatchery production is approved that there will be a cascading effect on our already declining coastal communities. Less fish coming across our docks affects fishermen, process workers and plants, the cost of electricity, groceries, housing, education and much more affecting every resident. Coastal communities, where these hatcheries operate, are struggling to survive and can not afford the financial impact of these proposals.

Regarding Proposal 171, I believe that pink salmon straying is something that should be accepted as a natural safeguard of our rivers. As a pilot I have seen from the air, small river salmon runs decimated by dry summer droughts or landslides only to be rebuilt in a matter of two to three 2-year pink salmon cycles due to straying pinks. Another example of nature's ability to replenish her streams would be the Katmai volcano of June 6, 1912 which entirely filled all of the streams on Afognak and part of Kodiak and the mainland district with highly acidic volcanic ash, decimating these runs. Only to be rebuilt over time through nature's ability to allow salmon to stray from their stream of origin.

Alaska hatcheries are run based on solid biological data. The health of the fish, streams and ecosystems are in the forefront of their management. Other pink and chum producing countries in the Pacific Rim do not have the same management mentality. The closure of Alaska hatcheries is an open invitation for these countries to flood the world's markets and streams with ill managed hatchlings.

Hatcheries help to provide an economical protein source for government food programs both domestically and around the world. If they are set up to fail through these proposals, or any others, there will be many and varied detrimental impacts.

Thank you

David Hilty

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Magnolia Hirsch, and I am a hatchery worker and research technician with the Northern Southeast Regional Aquaculture Association in Southeast Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals were to be adopted, I would completely lose job security as someone currently paying student loans.

Our community is built on commercial fishing, and by adopting these proposals, harvesting would be reduced, directly and indirectly impacting the community through trickle-down effects. I would expect salmon runs to significantly decrease if egg takes were reduced. Runs impact the community directly but also impact the ecosystems. Hatcheries help maintain naturally occurring salmon runs by taking harvesting pressures off wild runs through hatchery egg intake.

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

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

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

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

Sincerely,

Magnolia Hirsch


Submitted by: Cole Hockema

Community of Residence: Kodiak

Alaska Board of Fisheries

Alaska Department of Fish and Game

P.O. Box 115526

Anchorage, AK 99811-5526

March 2, 2026

Re: Oppose Proposals 163, 164, 165 and 170, 171, 172

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Cole Hockema. I have been a resident of Kodiak for the last 14 years. My wife and I moved here in 2012 and are raising our two daughters in Kodiak. I am the captain of our family-owned and locally operated vessel, the F/V Pacific Storm. In addition to supporting my family, my vessel provides year-round employment for several crew members, most of whom are Kodiak residents. We purchase fuel, groceries, gear, parts, repairs, and services locally, contributing to Kodiak's small businesses and marine trades.

We participate in the Gulf of Alaska pollock and Pacific cod trawl fisheries and tender salmon in Kodiak during the summer. While trawl fisheries make up most of our annual effort, salmon tendering is a critical part of our business model. It provides steady income during periods when trawl seasons are closed and helps stabilize our operation across the year. I want to see all of Kodiak's fisheries thrive — trawl, salmon, sport, subsistence — because it takes a diverse and balanced fleet to sustain our community. For these reasons, I strongly oppose Proposals 163, 164, 165, 170, 171, and 172.

Although a large portion of our fishing occurs outside of three nautical miles, there are important areas inside three miles that are essential to our operations. In Kodiak, we fish in areas such as Marmot Bay, particularly during the A season and during periods of rough weather. These inside areas allow smaller vessels like mine to operate more safely by providing protection from heavy seas and allowing us to make shorter transits from town, reducing fuel costs and risk. These areas also help fill in the gap of fish for shoreside processors when weather doesn't allow for fishing in other areas, keeping the fish plants and their employees working. For vessels under 58 feet in the Western Gulf of Alaska, access to inside waters can make the difference between participating in a fishery or being tied to the dock. These areas are important to maintaining viable fishing seasons, providing early season paychecks for crew, and sustaining the economics of our operation.

The areas we fish inside three nautical miles around Kodiak are generally steep, rocky, and uneven. They are not places where anyone would intentionally drag a net on the bottom. Our midwater trawl gear is fished up off the bottom in the water column. If I attempted to fish my midwater net on the bottom in these areas, I would almost certainly destroy it. My codend and net represent an investment well over \$100,000. The idea that we would risk that level of capital by haphazardly dragging on rocky bottom is unrealistic and inconsistent with how this fishery operates.

I have participated in the Trawl Electronic Monitoring program since 2024. Cameras are on for 100% of my pelagic pollock trips. As trawl fishermen, we are already heavily invested in improving monitoring, transparency, and scientific understanding of our gear. We are voluntarily participating in the Gear Innovation Initiative, where researchers from Alaska Pacific University are using detailed net plans, gear specifications, and interviews about how we fish to model how pelagic trawl gear functions in the water column. That information will be compared to field trials and used to replace outdated assumptions about bottom contact with scientifically derived data. This work is incorporated into the North Pacific Fishery Management Council process, peer-reviewed by its Science and Statistical Committee, and will inform updates to the Fishing Effects model in the Essential Fish Habitat 5-

year review under the Magnuson-Stevens Act. This is a public, transparent, and science-based process that is already underway.

I am writing in opposition to Proposals 163–165 because they are outside the Board’s authority as written and appear not to have been developed with a full understanding of how the fishery operates. These proposals would create significant new expense for the State of Alaska — at a time when the state faces ongoing fiscal challenges — and additional compliance costs for vessel operators, with unclear or unproven conservation benefits. We already have strong federal oversight, electronic monitoring, and ongoing scientific review addressing the very issues raised by these proposals.

While I oppose Proposal 165 because it exceeds the Board’s authority and because the State currently lacks a practical mechanism to monitor and enforce excluder use, I want to be clear that I already use a salmon excluder when fishing. It is the responsible thing to do, and avoiding salmon bycatch is in everyone’s interest. Salmon excluders are designed to allow salmon to exit the net while retaining target species like pollock, and their use reflects our fleet’s commitment to conservation and accountability. Responsible operators are already implementing these tools without the need for additional state mandates that may conflict with federal management.

I also strongly oppose Proposals 170–172. These proposals are misguided and pose a threat to the coastal communities that rely on salmon fisheries. Alaska’s hatchery program supplements pink and chum salmon stocks in a responsible, science-based manner. Hatcheries were never intended to replace wild stocks, nor do they. Oversight and permitting authority should remain with the Alaska Department of Fish and Game, the agency with the scientific expertise and statutory responsibility to manage salmon in accordance with Alaska’s sustained yield principles.

Salmon are important to my business and my community. In the summer, my vessel tenders salmon in Kodiak, directly supporting local fishermen and processors. Those tendering opportunities provide critical income that keeps my crew employed and my operation financially stable. A strong hatchery program supports consistent harvest opportunities that benefit fishermen, processors, support businesses, and local families. Hatchery production has not diminished salmon fishing opportunities in Kodiak; instead, it has strengthened the economic foundation of our coastal communities.

Alaska’s hatchery program benefits commercial fishermen, sport anglers, subsistence users, processors, and the broader state economy. As Board members, you are entrusted with balancing user groups while ensuring the long-term sustainability of our fisheries. Actions that undermine the hatchery program or restrict responsible fishing access without clear scientific justification risk unintended consequences for working families and small coastal towns like Kodiak.

For all of these reasons, I respectfully urge you to take no action on Proposals 163–165 and 170–172. Please allow the existing science-based, transparent management processes to continue and avoid measures that would create unnecessary cost, uncertainty, and hardship for Alaska’s fishing communities.

Thank you for the opportunity to comment and for your service to our state.

Sincerely,

Cole Hockema

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Nicholas Hoffman, and I am a commercial fisherman based in Kodiak, Alaska. I make my living supporting my family by catching salmon, and I also subsistence fish to fill my freezer and feed my family and friends.

I am writing to urge the Board to reject Proposals 170, 171, and 172. The hatchery in Kodiak provides some stability to a variable salmon run, and any reduction in salmon would mean less money for all the fishing boats in the fleet. Some years, about half my time is spent fishing at the hatchery, and any reduction would affect my bottom line.

The hatchery in Kodiak produces so many fish for the subsistence, sport, and commercial fisheries. A 25 percent reduction would affect everyone.

Some regions in Western Alaska have seen large declines in the number of salmon returning. Meanwhile, Bristol Bay has seen record return after record return. Salmon hatcheries hundreds of miles away have no impact on the returns in Western Alaska. In-river disease issues or high river temperatures in summer are a much more likely reason for the declines.

Hatchery programs help everyone by increasing the number of fishing opportunities in a region. Their work together with ADF&G on data collection, stream and ocean monitoring, and all the sampling of fish provides so much data on the ever-changing ecosystem in the Gulf of Alaska.

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

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

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

coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

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

Sincerely,

Nicholas Hoffman

Kodiak, Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Tyler-Rose Hoffman, and I am the wife of a commercial fisherman in Kodiak, Alaska. I co-own our business and our vessels.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Salmon seining in Kodiak is our primary source of income. My husband often fishes at the hatchery, and we rely on those fish to feed and shelter our family. Especially in otherwise lean years, access to hatchery fish is key for us to care for our family and keep our business operating.

We are not the only family that benefits from hatchery fish. Reduced harvesting opportunity at our hatchery impacts many people in the community — other fishing families as well as those employed by the processors and those who rely on hatchery fish for subsistence food.

Any hatchery reductions should only be made if justified by solid science, not based on hard feelings or mere speculation. These changes would impact too many people to be made lightly.

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

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

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,
Tyler-Rose Hoffman!
Kodiak, Alaska



Submitted by: Gary Hollier

Community of Residence: KENAI,AK

DEAR MADAME CHAIR AND MEMBERS OF THE ALASKA BOARD OF FISH,
MY NAME IS GARY HOLLIER. I AM A 72 YEAR LIFELONG RESIDENT OF KENAI, ALASKA.
I HAVE BEEN A SETNETTTER IN COOK INLET FOR 55 YEARS.

I AM WRITTING TO OPPOSE PROPOSAL 175. THIS PROPOSAL WOULD REDUCE THE SIZE OF THE WEB IN A DIPNET FROM 4.5 INCHES TO 3 INCHES.

ADDITIONALLY THE USE OF A ROPE ATTACHED TO THE VESSEL AND THEN TO THE DIP NET WOULD BE ELIMINATED.

I PERSONALLY HAVE OVER 100 TOTES OF GILLNETS. THE MESH SIZE VARIES FROM 4 3/4. INCH TO 5/1/8 INCH.

HIS AMOUNTS TO OVER \$100,000 WORTH OF GEAR THAT I CAN NOT USE.

IN 2024, WHEN THE BOF, CREATED A STOCK OF MANAGEMENT CONCERN FOR LATE-RUN KENAI RIVER KING SALMON, THEY ASLO CREATED A SET NET DIP NET FISHERY IN THE PLAN,

IN THE NEWLY CREATED DIP NET FISHERY, I HAD TO PURCHASED 4.5 INCH GEAR TO BE LEGAL IN THIS FISHERY. THIS WAS A CONSIDERABLE STRAIN, SEEING THAT THE ESSN FISHERY HAS BEEN A FEDERAL DISASTER FOR 6 OUT OF THE LAST 7 YEARS.

WITH ONLY 2 YEARS IN THE STOCK OF CONCERN PLAN ,IT ONCE AGAIN WOULD ANOUNT TO INCREASED COST, IN A FISHERY THAT AT TIMES IS VERY CHALLENGING TO BE PROFITABLE.

THERE IS A UPPER COOK INLET MEETING IN 2027, WHERE THIS AND MANY ISSUES COULD AND WILL BE ADDRESSED.

WITH THE SECOND LARGEST TIDES IN THE WORLD, IT ALSO WOULD BE VERY HARD TO DIP NET WITHOUT ATTACHING THE DIP NET , WITH A ROPE, TO THE VESSEL.

DURING ROUGH WEATHER, BIG TIDES, AND RUNNING LINES EVERY 600 FEET ON THE BEACH, LOSING THE ABILITY TO ATTACH A ROPE TO THE DIP NET, WOULD MAKE DIP NETTING VIRTUALLY IMPOSSIBLE.

HIS DIP NET FISHERY IS AT BEST 5% OF THE ECONOMIC POTENTIAL OF A REGULAR SET NET SEASON IN THE AREA WHERE I SET NET IN COOK INLET.

ALL DIP NET FISHERIES ARE DIFFERENT. PLEASE DO NOT PASS PROPOSAL 175.

THANK YOU,

GARY L HOLLIER

KENAI, AK.

Oliver N. Holm

March 2, 2026

[REDACTED]
Kodiak, AK 99615

Alaska Board of Fisheries

My comments on proposals 170, 171, & 172.

Board members,

I am opposed to the adoption of all three of these proposals. My comments will be primarily focused on proposal 170 which would have the most immediate negative effect on Kodiak's salmon fisheries.

I have been an elected representative of Kodiak salmon fishermen on the Kodiak Regional Aquaculture Association board of directors and the Kodiak Fish and Game Advisory Committee since the 1980's and began salmon fishing in Kodiak in 1964.

A 25% reduction in pink salmon production at the Kitoi Bay Hatchery would have an immediate negative impact on KRAA's ability to provide fish for our common property fisheries. Fewer fish would be available for harvest, processing and food for the public. Pink salmon have been the most consistently productive production for KRAA and provides most of the money to fund our other programs/fish releases.

The speculation behind proposal 170 that pink salmon are somehow reducing king salmon abundance in the Yukon and Kuskokwim Rivers isn't supported by evidence. How much of an increase in AYK king salmon would result from a 25% reduction in pink salmon releases? There isn't any credible answer to that question. The idea that pink salmon are somehow out competing king salmon in the North Pacific Ocean ignores the differences in life history between the two species. Pink salmon enter the marine environment at a very small size and remain small enough to be prey for feeder kings for most of that year. King salmon smolt enter at a much larger size and spend several years feeding at progressively larger sizes where their prey would be much larger than that targeted by our pink salmon releases.

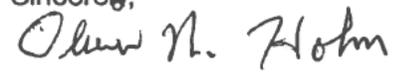
Pink salmon aren't the only species feeding in the North Pacific. There are large biomasses of squid and pollock as well as others out there. The pollock fishery by-catch of feeder kings indicates that there is significant overlap in feeding areas of pollock and king salmon. Pink salmon are conspicuously absent in the by-catch. This is a verifiable indicator against food competition between pink salmon and king salmon for most of the year.

There has been speculation that the odd year dominance of Alaska pink salmon returns indicates that pink salmon numbers are driving prey abundance in the Gulf of Alaska. Rather than causing the two year cycles in the gulf, the cyclical variations are driving the differential survival of pink salmon as well as other species. KRAA attempts to release the same number of pink salmon on both odd and even years. Our returns follow the pattern of bigger returns on odd numbered years. If our pink salmon releases were driving the odd/even cycles wouldn't you expect that our even year pink returns would be the same as the odd year returns or maybe even larger due to less wild pink competition?

Proposal 170 would impose significant losses on our fisheries without the likelihood of an actual benefit to the AYK fishers.

With decades of personal involvement in salmon enhancement, I am quite concerned about the possibility that the BOF would now intrude in our operation and overturn decades of experience and process involving the public, KRAA, and the Department of Fish & Game that has led to our current operation and production.

Sincerely,

Handwritten signature of Oliver N. Holm in black ink.

Oliver N. Holm

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Eric Holmstrom, and I am a commercial fisherman based in Washington State, operating under Holmstrom Fisheries LLC.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I have relied on the fish supply and opportunities provided by Alaska's hatcheries for over 20 years and recently invested in a drift gillnet operation, with the majority of my business deriving from hatchery support.

The economic loss from these proposals would impact my young, growing family, which is rooted in the commercial salmon fishing industry in both Alaska and Washington. We saw what happened in Washington following the Boldt Decision and the defunding of hatchery programs — a collapse of the industry and with it the culture that defines our regions.

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

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

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

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

Sincerely,
Eric Holmstrom
Washington State



Submitted by: Mark Holst

Community of Residence: Sitka

Hello Madam chair and esteemed Board of Fisheries members,

My name is Mark Holst, I own the Troll vessel October out of Sitka and am a born and raised Troller/Longliner. Thank you for this opportunity to share my thoughts.

I oppose proposal 168.

This proposal is too broad and all encompassing to be effective. As an example, I crew on a boat in SEAK for Dinglebar season, which is a ground fish fishery. When the season ends we break down the gear and put it away in the cabin of the boat and move on to the next fishery, often Sablefish longlining. We would then be in violation of the law because we are participating in a ground fish longline fishery with Dinglebar Lingcod jigs on board. I could never in a million years catch a Sablefish with Dinglebar gear and yet we would be in violation of the law. Again, this proposal is too broad and far reaching to be effective, there are much better solutions to this problem than proposal 168.

I strongly Oppose proposal 170.

Reducing the permitted egg take level by 25% will have severe unintended consequences. A reduction of this size to our Chum and Pink salmon production would not only be devastating to our commercial fishing fleets, but also detrimental to the health of our hatcheries themselves. This proposal does not provide any data showing what stocks would benefit, what the impacts of this reduction would be, nor provide any analysis for why 25% is the correct reduction to achieve the unspecified goals. The state of Alaska is a very large place with many differing ecosystems. A flat 25% statewide reduction without site specific analysis bypasses the entire scientific process that our fisheries and hatcheries are built on. This proposal neither demonstrates a specific problem, nor provides a working solution.

I Oppose proposal 172 for the same reasons I oppose proposal 170.

A statewide moratorium, just like a statewide reduction as in 170, completely bypasses site specific scientific studies without adding any proven conservation benefits. Hatchery production has been stable for the better part of a decade, strong wild salmon returns continue in areas that have multiple operating hatcheries. Here in southeast we have seen our King salmon stocks of concern rebound, all the while continuing with normal hatchery production.

I Oppose proposals 176, 177.

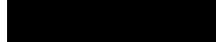
Proposal 176 specifically states that one of its intentions is to increase food securities for non residents. Alaska is not the land of unlimited resources. In the midst of King salmon allocation cuts, Halibut quotas cuts, as well as many other struggles our resources are experiencing, why are we focused on increasing non resident food insecurities? The purpose of non resident sport fishing is not for filling the lower 48s freezers with our fish. The purpose is to bring outside commerce into our great state for the betterment of our economies while providing equal opportunity for everybody to enjoy our oceans bounties. Potentially increasing primarily non resident take of alaskan resources will neither assist in the recovery of our stocks, nor increase the number of non residents clients returning to fish another year.

I Oppose proposal 178.

Although I agree with the intent of this proposal, I believe the consequences of this would be the same as in proposals 176 and 177, which is a pooled bag limit and potentially increased non resident harvest.

February 28, 2026

Homer Charter Association



Homer, AK 99603

Alaska Board of Fisheries

1255 W. 8th St.

Juneau, AK 99811

RE: Proposal 183

Dear Chair Carlson-Van Dort and Members of the Board,

The Homer Charter Association (HCA) does not support Proposal 183, as currently written. The proposal would require an angler to retain all fish carcasses that cannot be used as bait, a mandate that would apply across multiple species. The requirement of such measure would impose an undue burden on the City of Homer Port and Harbor and strain city services beyond reasonable expectations. In addition to being a burden on anglers and charter businesses, disposing of all carcasses caught at sea would be a logistical disaster. It's unclear if the existing infrastructure could even handle the increased load of fish carcasses. As such, HCA respectfully requests that Proposal 183 be amended to align with the existing federal regulation to ensure consistency, practicality, and enforceability.

The HCA is a local trade group based in Homer, Alaska that represents guided recreational stakeholders in the Alaskan communities of the lower Kenai Peninsula and Kodiak. The HCA is proud that the regional economic impact of our fleet goes beyond benefiting just our members. We are a pillar within the cooperative framework of fishers, fleets, and marine trade workers that make our region strong and our communities resilient.

Thank you for your consideration,

Homer Charter Association

March 1, 2026

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

RE: Proposals 170, 171, 172

Ms. Chair and the Board of Fish:

Hello, I am Bryan Horn, third generation commercial salmon seiner in Kodiak as well as a sitting board member at KRAA. I am writing in opposition to proposals 170, 171, and 172.

Any decrease in anyway considering production at Kodiak Regional Aquaculture Association would have detrimental effects for the Kodiak fishing fleet. In turn, having consequences in the entire Kodiak community.

Kodiak's weak red salmon runs recently have made the early run chum fishery in and around Kitoi Bay hatchery a major booster for the Kodiak salmon seiners. For the last 3 years, the hatchery has helped fishermen greatly. the first two of those 3 years, there were a limited number of vessels however enough fish to make it work. Last June with our prior restrictions on the westside of Kodiak and Southwest corner brought basically the entire normal westside boats to Kitoi. Making it very crowded, I do believe everyone did well enough to make June fishing in Kodiak viable. Cuts to chum production and removing this option in Kodiak would make June not worth even fishing.

With concerns to pink salmon, it is well known that Kodiak is very volatile. Typically, at KRAA, in years of low wild returns, we take far less cost recovery to let the common property harvest a vast majority of the return. On years with big wild forecast, we take more cost recovery to cover the low years. The hatchery and the wild fish work hand in hand to keep Kodiak a place my children can fish. Cutting pink salmon would force KRAA to take more fish every year and leave little on the table for fishermen.

I have been fishing in and around the hatchery for 38 years. I began at 6 years old riding around with my father learning the ropes. Then moved upped to deckhand, skiff man and finally captain. For the last 25 years I have been behind my own wheel supporting my family. My 4 kids come out on the boat often. For the last two years my two high school sons have been full share crewmembers working with me the entire summer. I hope my kids can continue to have the same chances I did getting into this industry.

The other proposals would be equally bad for hatchery programs whether in Kodiak or elsewhere. There's no need to take these actions when there's science and oversight by the Department. I urge you to take no action on any of the proposals concerning hatcheries.

Thank you for your time.

Bryan Horn
Kodiak, Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Chris Hottinger, and I am a commercial fisherman, subsistence user, and sport fisherman based in Cordova, Alaska.

The reduction in hatchery production would directly affect my job security and my family's livelihood. These proposals would also directly reduce harvest opportunities.

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

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

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

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

Sincerely,

Chris Hottinger
Cordova, AK, Alaska



Andrew Hull - Area E drift gillnet fisherman and permit holder**Oppose - Proposals 170, 171, 172**

As a career commercial fisherman and permit holder/participant in the area E drift gillnet fishery, I strongly oppose proposals 170, 171, and 172. These are speculative, sweeping reductions that have no guarantee of benefitting wild salmon stocks while ensuring a negative impact on all user groups by destabilizing the hatchery systems that provide sport, subsistence, and commercial opportunity as well as research, monitoring, and data collection.

Economic Impacts

The 10 year average of annual statewide hatchery chum and pink salmon ex vessel value is over \$48 million for chum salmon and \$44 million for pink salmon (COAR data from ADFG). A 25 percent reduction in egg take would lead to over \$23 million in economic losses in ex vessel value alone, with total economic losses being higher as impacts ripple through coastal communities. Lower revenue from chum and pink production means less money circulating through fishing communities and slimmer margins for fisherman who are already struggling to navigate variable market conditions, higher operating costs, and labor shortages.

Misleading scientific claims

Proposal 170 cites a literature review (Mcmillan et al. 2023) that examines interactions between hatchery salmonids and wild salmonids, claiming 83% of studies find adverse or minimally adverse impacts. This figure is incredibly misleading. Of the 206 studies this literature review examines, only half are even from the United States. Brown trout is the most commonly researched species in this literature review, with steelhead and Atlantic salmon being the third and fourth most examined species. Only 28 of the 206 studies examined chinook salmon, nine looked at coho and pink salmon, and none looked specifically at chum or sockeye salmon. Furthermore, only 11% of the studies evaluated hatchery effects in the ocean, which is where competition between hatchery and wild stocks would in theory occur.

Clearly, the results of this study cannot be extrapolated to the Alaska hatchery system and should serve no basis for policy decisions. Hatchery management needs not only to be data backed and science driven, but the science needs to pertain to Alaska and not be misrepresented to paint a false narrative.

Impacts on all user groups

These proposals focus on chum and pink salmon hatchery production that is largely harvested by commercial fisherman, but many of the impacted hatcheries also

produce runs of sockeye, coho, and chinook salmon that are heavily targeted by sport and subsistence users. In PWS, during years when sockeye hatchery returns have fallen short of cost recovery goals, PWSAC has used chum salmon hatchery production to supplement its sockeye cost recovery goals, allowing the entire hatchery operation to continue running. Placing restrictions on egg take for pink and chum salmon will reduce the flexibility these hatcheries have for generating revenue to continue operating, jeopardizing harvest opportunities for all user groups. Additionally, hatcheries provide valuable data collection, research, and ecosystem monitoring that help inform management, further benefitting all user groups.

In conclusion, I am strongly opposed to proposals 170, 171, and 172. These proposals are based on dubious science that has no guarantee of changing ocean dynamics or benefitting wild stocks. Meanwhile, these blunt, sweeping reductions will have guaranteed negative impacts on not only the hatchery systems but on commercial, sport and subsistence users.

PC224

Submitted by: Colin Hurley

Community of Residence: Eagle River

Would love to see little to no trawling, protection for coho, and limited hatchery release of pinks.

PC225

Submitted by: Pete Imhof

Community of Residence: Wasilla

Proposal 186

We're seeing a trend with lack of coho in the susitna drainages, this trend has left us with restrictions and multiple closers for the last 3 yrs, it's very apparent that the high sockeye numbers on the kenai have triggered multiple EO for the drift fleet which is affecting our coho up north, believe it or not families depend on coho, guides would like a complete season and recreational fisherman are left holding the Burden of conservation. Over escapement of reds on one fishery isn't justification to over harvest a mixed stock moving to the north.. please consider 186 it's well thought out. Thanks for your time I'm good.

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Clifton Ivanoff. I own and operate a commercial salmon seiner fishing out of Kodiak, Alaska. I began fishing as a young boy with my father and now operate my own vessel.

The proposed hatchery reduction would significantly impact my fishing opportunities. In 2025, approximately fifty percent of my salmon catch came from the Duck Bay hatchery run. A 25 percent reduction in catch could force already struggling fishermen to make difficult financial decisions between vessel maintenance and basic household expenses.

Kodiak's economy is deeply tied to fishing. When fish stocks are down, the entire town feels it. Processors operate at limited capacity, retailers reduce supply orders, fuel docks sell less fuel, and marine trades experience reduced demand. Hatchery programs have been a vital tool in enhancing and stabilizing salmon production in Kodiak.

Permanent or unjustified changes to hatchery programs could severely impact the community and potentially lead to unnecessary legal and financial burdens.

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,
Clifton Ivanoff
Kodiak, Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Peter Ivanoff, and I am a commercial salmon seiner in Kodiak. I have fished at Kitoi Bay Hatchery for many seasons, and I fish aboard the F/V Aleutian Belle.

Proposals 170, 171, and 172 would reduce fishing opportunities for the fleet and leave less fish for processors. These proposals would lower our fish intake, slow processors, and affect our local economies with ripple effects across businesses and families.

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

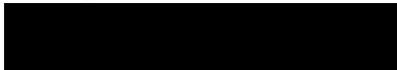
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data 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,

Peter Ivanoff
Kodiak, Alaska



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

March 1, 2026

Re: Oppose Proposals 11, 163, 164, and 165

Dear Chairwoman Carlson-Van Dort and Board Members,

My name is Alex Jackson. I am an Alaska resident and live in the community of Sand Point, Alaska. I own and operate the F/V Karen Evich, a 58-foot combination vessel. For the proposals under consideration, we trawl for cod and pollock in the Aleutian Islands and the Gulf of Alaska.

Proposal 11 would effectively end our ability to trawl for cod in the Aleutian Islands. In some years, traveling to Adak and participating in the State Waters trawl fishery has literally saved our winter season. Although there has not been a processor in Adak for many years, the last time there was a market there, we participated in the Aleutian Islands State Waters trawl fishery. Our vessel's first season fishing in that area was in 2001.

Originally, small trawlers (58-foot vessels) were fishing in the parallel fishery because they did not have federal LLP's for outside of three miles. With the help of Clem Tillion, who advocated for small-boat fishing opportunities, the Aleutian Islands State Waters fishery was created. The first 58-foot vessels to participate were trawlers—not pot boats.

This proposal would negatively affect my business and would also eliminate future opportunities for economic growth in the communities of Adak and Atka should a processor re-establish operations in those areas.

Proposal 163 would also eliminate most of our traditional pollock trawl grounds in Gulf of Alaska Area 610. At least 75% of our A-season pollock

fishing occurs inside three miles, and likely about 50% of our B-season fishing as well. Removing this area from trawling would be absolutely devastating to the small-boat fleet.

The larger vessels—the ones people typically picture when they think of “trawlers”—have more offshore options because they can safely operate in rougher weather. Small vessels like ours rely on these nearshore areas to maintain flexibility, move around, and avoid bycatch. Banning trawling inside three miles may appear to target large vessels, but in reality it will disproportionately harm 58-foot, Alaska-owned and operated boats fishing out of Sand Point and King Cove.

Proposals 163 and 164 both address bottom contact of pelagic trawl gear. Currently, we are voluntarily participating in the Gear Innovation Initiative. Alaska Pacific University is using our net plans, door sizes, main wire output, and other operational data to better understand how our gear functions. This work will provide updated, science-based information on how much bottom contact these nets actually make and is being incorporated into the North Pacific Fishery Management Council process. I strongly urge the Board not to make assumptions or take regulatory action before this project is completed and real data are available.

No one wants to put pelagic nets on the bottom. These nets are expensive to build and repair. The only areas where bottom contact can occur are soft, muddy bottoms. In areas with rocky habitat or hard bottom, I actively keep my net as far off the bottom as possible.

Proposal 165 would require mandatory salmon excluder use in State Waters. While I believe this proposal exceeds the Board’s authority and would be difficult to enforce, I personally use a salmon excluder because I know they work, and my primary goal is to avoid bycatch whenever possible.

I want to emphasize that fishermen in the Aleutian East Borough are already struggling to survive under the current regulatory framework. Our communities are facing shrinking fishing opportunities, rising operational

costs, declining infrastructure, and the continued loss of processing capacity. Many of us are operating on razor-thin margins, and each additional restriction further erodes our ability to remain viable.

We are tired—but we are still here. We are doing the work. We are participating in research, adopting new gear, avoiding bycatch, and adapting in real time to changing conditions on the water. What we need from this Board is stability, restraint, and decisions grounded in data—not additional closures or assumptions that disproportionately burden small, Alaska-based vessels and the coastal communities that depend on them.

Please do not take action on Proposals 11, 163, 164, and 165. Preserving access to these fisheries is critical to the survival of fishing families and communities throughout the Aleutian East Borough.

Thank you for the opportunity to comment.

Sincerely,

Alex Jackson

F/V Karen Evich

Submitted by: Brandon Jackson
 Destination Alaska Charters
Community of Residence: Homer

Hello All,

I am writing in support of Proposal 176. My family and I own a high-end charter company in Homer. We have been operating here for 8 years now, and have grown to run three boats. We specialize in private trips that primarily get booked by families. My support for a cumulative bag limit comes from this perspective. We often times have young kids or elderly folk on board who are not able to fully participate in fishing due to physical constraints. The way the law is currently written requires them to push their physical limitations to legally catch/retain fish.

Example 1: Roughly 20% of our clientele have children 5 years old and under. As we have USCG-inspected vessels, we are required to have a railing height of 39.5 inches. Our rod holders are then mounted to the top of that. There is no physical way they can reach unless a parent holds them up to the rod. Add in rough seas or seasickness, and it becomes nearly impossible for that child to legally hook and bring in their own fish. This can lead to a lot of frustration and/or unsafe scenarios of parents trying to hold their children up on the rails. Proposal 176 will allow parents to hook the fish and assist their child in bringing in said fish, creating a safer and more enjoyable experience for all.

Example 2: Another group of our clientele is elderly folks/grandparents joining their families. It is common for them to have difficulty balancing on a rocking boat, especially with the additional challenge of navigating fishing gear. This often leads to them either opting out of fishing altogether or pushing past their safe limits in an attempt to stay legally compliant with hooking and catching their own fish. Proposal 176 would allow for the crew/family to be involved in/assist with the entire catch process. This would ultimately create a safer and more enjoyable environment for this demographic.

As a captain, the safety of my guests is my number one priority. I strongly believe that proposal 176 would allow my crew and me to accomplish this to a higher degree by being more hands-on with our physically limited guests. Greatly appreciate you all considering this proposal.

Cheers,

Brandon Jackson

Submitted by: Tony Jackson
Community of Residence: Nikiski

I oppose proposal 175. As a commercial set net fishing business, it is already extremely financially detrimental to our family's business to be reduced and relegated to using dipnets. IF you are going to continue to close set net fishing and open us only to use dipnets, I urge you to consider that restricting the dip net even further will not entice any more fishermen to utilize the already extremely minimal gear type. Please leave this one alone and allow dipnets to remain the same mesh and the use of rope and a boat to fish.

Submitted by: Gordon Jensen

Community of Residence: Cordova, AK

My name is Gordon Jensen. I have been an Alaska resident and commercial fisherman since 1977, with direct participation in one fishery or another in different parts of the state since 1979. I am currently a PWS Seine permit holder, vessel owner and captain, operating a mostly family operation for the last 20 years.

Proposal 170: I oppose proposal 170

I believe that reducing egg take, and subsequent release, would reduce returns in a very negative way. I think a large portion of the release is consumed by predators who are habituated and waiting for the release each year. predator control should be considered and studied.

Proposal 171: I oppose proposal 171

I'm not a scientist but am of the opinion that straying is sometimes a natural reaction to environmental factors and has been happening, in one form or another, since salmon runs began. It could also be good for genetic diversity. More study is needed.

Proposal 172: I oppose proposal 172

For the same reasons as quoted above.

Proposal 187: I oppose proposal 187

This seems to be a resource takeover for commercial sport fish operators.

Regarding other proposals:

I support Proposal 165 – Require salmon excluders for pelagic trawl gear.,

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

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

Thank you for your time,

Gordon Jensen

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Steven Jicha, and I am a commercial fisherman based in Kenai and Cook Inlet. I fish aboard the Seena, and my livelihood depends on having strong and stable salmon returns.

Less fish means the crawlers take up more of our fish, and they will kill it off before you know it, so keep the hatchery open. Reduced harvest will hurt everyone involved and could kill the fisheries altogether. If these proposals move forward, it will mean less jobs and less money not just for fishermen, but for the State of Alaska as well.

Do not mess with what has been working.

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

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

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

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

Sincerely,
Steven Jicha
Kenai/Cook Inlet, Alaska



Submitted by: Jared Jillie

Community of Residence: Sitka

Proposal 170

I strongly support proposal 170. I have worked as a fisheries biologist, employee of various PNP hatcheries, and as a commercial power troller for the last 15 years. I do not think that the current level of hatchery releases are sustainable and are becoming detrimental to the wild stocks as well as detrimental to the hatchery fish themselves. I have personally watched the decline in the quality of fish especially Coho and Kings. We do not fully understand the impacts this volume of hatchery fish is causing on the ecosystem. With Western Alaska King stocks in decline as well as Coho having poor returns in South East we need to limit direct competition for these fish. Catching three pound Coho's as a troller is not profitable and the processors cannot market these fish. Over the years I have seen both Kings and Cohos decrease in size. A quality over quantity approach would be much more practical. Juvenile Chum, Coho, Pinks, and Kings directly compete with each other in their ocean phases especially in early life stages. I believe we have surpassed the carrying capacity of the Gulf of Alaska ecosystem. While many are pointing the finger at trawlers currently, we should be looking at what we have done to the ocean food web by releasing such huge volumes of hatchery fish. Hatchery fish are for supplementing wild stocks for increased harvest opportunities. They are NOT for replacing and hindering wild salmon populations and driving down quality of all salmon regardless of there origin.

Submitted by: Brent Johnson

Community of Residence: Clam Gulch

I oppose Prop 186. It seeks to restrict commercial drift net fishing. Sockeye escapements have been consistently above the goals in recent years and this is likely to make it even harder for ADF&G to hit their target escapement range. Furthermore, there is not sufficient reason to take Proposal 186 up out of cycle.

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

I am writing to express my opposition to Proposals 170, 171, and 172. I offer these comments in my personal capacity and not on behalf of any organization with which I am affiliated.

I come to this issue from several perspectives. First and foremost, I am a resident of Cordova, a subsistence user, a business owner, and a tribal member of the Native Village of Eyak. I care deeply about the long-term health of wild fisheries and the way of life they support in Prince William Sound and the Copper River region. There is no long-term benefit in risking the sustainability of our resources for short-term gain. The health of our community is inseparable from the health of our fisheries.

I am also a shareholder of both Chugach Corporation and Eyak Corporation, and I serve on the board of directors of the latter. Our shareholders live across Alaska and rely on salmon for subsistence, sport, and personal use. They benefit not only directly from hatchery programs in Prince William Sound, but also indirectly through employment and economic activity supported by strong fisheries and tourism.

Lastly, I serve as Chairman of the Board of the Prince William Sound Aquaculture Corporation. It should come as no surprise that I oppose the proposed 25% reductions in pink and chum salmon production. In my review of the available information, I do not see compelling empirical evidence demonstrating that hatchery pink and chum salmon abundance or straying are causing measurable harm that would justify reductions of this scale. I will leave the detailed scientific arguments to the formal submissions made by hatchery organizations.

PWSAC's mission is "to ethically and professionally optimize salmon production in Area E for the long-term well-being of all user groups." A persistent misconception is that PWSAC exists solely for the benefit of commercial fishermen. The PWSAC Board consists of 45 seats, of which 27 are permit-based. The remaining seats represent sport, subsistence, municipalities, Native villages, processors, and other stakeholders who contribute diverse expertise in support of our mission.

Our five remote hatcheries supply salmon to all user groups. Their benefits extend well beyond Prince William Sound and the Copper River to Alaskans across the state who travel to the region to fish, recreate, and support local communities.

Pink and chum salmon are the financial foundation of PWSAC's operations. Revenue from those species supports coho, sockeye, and potentially Chinook programs that would otherwise struggle to sustain themselves. A 25% reduction would not only affect commercial harvest; it would limit opportunities for sport and subsistence fisheries and reduce the stability of enhancement programs that many communities rely upon. These consequences deserve careful consideration. PWSAC has not ignored the scientific questions surrounding hatchery-wild interactions. The organization has invested significant resources in research and has supported broader statewide efforts to better understand these dynamics.

With respect to Proposal 172, my opposition is straightforward: it is unnecessary. The hatchery permitting and production adjustment process is already extensive, collaborative, and public, with authority vested in the Commissioner of the Alaska Department of Fish and Game. I do not believe it is appropriate or prudent to shift that framework in a manner that could create regulatory uncertainty or undermine the existing management structure. For these reasons, I respectfully urge the Board to reject Proposals 170, 171, and 172.

Thank you for your time and consideration.

Sincerely,
Eli Johnson

Submitted by: Joshua Johnson
Community of Residence: Sutton
162 and 175

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is David Jones. I own a 58' salmon seiner that fishes in Southeast Alaska, and my wife owns and runs a Bristol Bay gillnetter. My sons and daughter-in-law also operate Bristol Bay gillnetters and work in the Southeast seine fishery. Our vessels include the F/V Zealot and F/V Janet Elaine.

Reduced hatchery production would reduce income and opportunity for fleets that have funded and built these programs through self-imposed assessments over many years. Hatcheries in Southeast Alaska were created in part to mitigate severe cutbacks to the District 4 fishery under the Pacific Salmon Treaty with Canada.

Hatchery reduction would reduce early-season fishing opportunities in Southeast. That would raise processors' fixed costs with fewer pounds to process, and those costs would be passed back to fishermen through lower prices. A shorter processing season also makes it harder to recruit and retain plant workers. The sport and charter sectors would also be impacted by reduced hatchery returns that support their fisheries and businesses.

Decisions made without rigorous scientific analysis would undermine Board credibility and weaken long-term trust in fisheries management. Hatchery fisheries also help relieve pressure on wild stocks by providing alternative opportunity and giving managers more tools to manage fishing effort.

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

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

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

necessity.

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

Sincerely,
David Jones
Southeast Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Kurt Jones, and I am a commercial fisherman, subsistence user, and sport fishing participant based in Prince William Sound, Alaska. I operate the F/V Pelican.

I am writing to urge the Board to reject Proposals 170, 171, and 172. My opinion on the personal effects of these proposals is beside the point. The reason these proposals are unacceptable is the lack of scientific evidence connected with the reasoning behind them.

Hatcheries are the only thing that has sustained the Prince William Sound salmon fisheries since the Exxon Valdez spill. They also provide harvest opportunities where increasing restrictions on the Copper River have limited the ability to make a living.

The financial implications of these proposals are certain to be felt negatively for years to come by Alaskans who have been encouraged to take the financial risks associated with Alaska's commercial fishing industry and economy.

I am concerned about the trend of making these decisions for political reasons rather than science-based sustainability reasons.

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

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

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

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

Sincerely,

Kurt Jones
Prince William Sound, Alaska



Submitted by: Evqn Jonjak

Community of Residence: Wrangell

Opposed to 170, 171, 172

Submitted by: Eric Jordan

Community of Residence: Sitka, AK

Comment on Proposals 163, 164, 165

Distinguished Board of Fisheries members, interested public, and staff,

I have a long history of involvement with groundfish trawling issues, beginning when I served on the Advisory Panel to the North Pacific Fishery Management Council (NPFMC) from 1978 to 1985. Later, in the 1990s, I supported efforts led by ALFA and Linda Behnken to prohibit groundfish trawling in the outside waters of Southeast Alaska, a measure that the NPFMC ultimately adopted. While working for the Alaska Marine Conservation Council in the late 1990s, I was tasked with drafting a Board of Fisheries proposal to prohibit groundfish trawling in the state waters of Southeast Alaska.

As part of that effort, I worked with then–Southeast Alaska groundfish biologist Victoria O’Connell and reviewed video documentation of the impacts of bottom trawling in Southeast Alaska. I also produced short videos to share at Fish Expo, Commercial Fisheries meetings, and other venues, and became very familiar with the effects of groundfish trawling on benthic ecosystems and habitat, particularly corals and sponges.

Through my involvement in groundfish proposals as Chair and longtime Secretary of the Sitka ADF&G Advisory Committee, I became aware of the uniqueness of different areas and communities in Alaska, and of how critical, detailed, area-specific regulations are to Alaska fisheries management. For example, during the Southeast Alaska trawl prohibition process, it became clear that a blanket trawl prohibition would also eliminate the longstanding pink shrimp beam trawl fishery in the Petersburg and Wrangell areas. I worked with local fishermen to amend the proposal to preserve that small-scale beam trawl fishery in those areas.

Here is what I believe regarding the trawl proposals currently before the Board:

In college, as an education major, I took a course in educational ethics. One lecture addressed the “standards for ethical corporal punishment” in public schools. A fellow student stood up and said, “This is wrong. Nobody should be swatting children in public schools.” I began clapping, and most of the class followed. The professor suggested more literature on these policy standards.

To me, the issue of managing Alaska's groundfish trawl fisheries is similar. The issue is not how we regulate bottom trawling, it is whether we should permit it at all. The most effective groundfish trawling places nets on the bottom, and the incentive to maximize efficiency creates enforcement and compliance challenges.

In summation, I believe the Board of Fisheries should consider prohibiting groundfish trawling in all state waters of Alaska. Just as salmon traps were eliminated for salmon and sunken gillnets were prohibited for groundfish, bottom trawl fishing should also be eliminated.

However, if the Board of Fisheries, in its infinite wisdom, decides to consider allowing groundfish trawling in Alaska waters, the effort should not proceed as a single statewide proposal but instead be considered from regional proposals, evaluated on a spatial area-by-area analysis, recognizing the significant ecological, community, and local fishery differences across Alaska.

Thank you,

Eric Jordan

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Patricia Kallander, and I have lived in Cordova, Alaska for 50 years. In those 50 years, my sole income has been from salmon. Commercial fishing sustains Cordova as our main source of employment. Whether on the grounds fishing, working the canneries, or running any business in our town, we 100 percent depend on a healthy fishery to survive. My husband and I owned many commercial fishing vessels over our 30-plus years of business, purse seining in Prince William Sound and gillnetting the Copper River.

I am writing to urge the Board to reject Proposals 170, 171, and 172. How would these proposals not affect us? Our seine fisheries are family owned, run by small businesses, and managed by community members. Everything we do in our town is based on the salmon — funding our schools, supporting small local businesses, maintaining our infrastructure as a small city, and putting our kids through college.

Less salmon means fewer jobs and economic instability. Our local businesses barely hang on as it is with the high cost of shipping, energy, and heating fuel.

Please pay attention to the science. We believe in the process of research. Less hatchery production will not change the outcomes of environmental changes in our oceans. Prince William Sound has been researched extensively since the oil spill. Since losing our entire herring fishery, we do not need more hits from more shoddy research studies.

Allow the Alaska hatchery research to continue to get clear answers before widespread reductions in egg take. You are not just cutting back on salmon — you are cutting entire livelihoods, families, and communities.

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

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

Submitted by: Darius Kasprzak
Alaska Jig Association
Community of Residence: Kodiak

Madam Chair Carlson-Van Dort and Board of Fisheries Members,

The Alaska Jig Association (AJA) would like to reemphasize our support for Proposal 167, which we have authored.

At our most recent AJA membership meeting in January, our members voted unanimously to support Proposal 167, as amended by the Kodiak Advisory Council (KAC).

Proposal 167 as amended by the KAC, would include the following language: vessels registered to jig Pacific cod fish in the Prince William Sound, Cook Inlet, Kodiak and South Peninsula Regions may only carry mechanical jigging machines and hand troll gear.

Approving Proposal 167 as amended would address the widespread perception amongst the jig sector- of current systematic fishing for Pacific cod with alternate gear types, that results in unlawful catch being offloaded and documented as jig caught.

We believe that passage of Proposal 167 will provide long term security for both entry level and career jig fishing operations alike.

AJA supports Proposal 166. A specific definition of “jigging machine” is long overdue. As typically used aboard legal jigging operations; the vernacular denotes an automated or clutched reel mounted on deck stanchions or rails, and light enough to be transported by a single fisher. Specifying realistic physical dimension limits will exclude much larger mechanisms (such as longline reels) that are also capable of vertically operating a single line in the water column. This will provide clarity to the fleet, remove temptation for cheating with non-jig gear, provide security for dedicated jig fishers, and provide needed guidance for law enforcement.

AJA supports Proposal 169. We strongly suspect based on anecdotal evidence, that slinky pot gear carried aboard some vessels is sometimes utilized for illegal fishing. A more specific definition of this highly effective and relatively recently introduced gear type, will be beneficial for both fishery stakeholders and management.

Sincerely,

Darius Kasprzak
President, AJA

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Vicki Sue Kuller. My husband has commercially fished in Alaska since he was 15 years old. Together we have built our entire life around the Alaska commercial fishery. We operate under Outlaw INC. and Rhoda Je-Anne INC., and have fished in Kodiak, Bristol Bay, and Prince William Sound for decades.

We have invested millions of dollars into permits, vessels, and infrastructure. Our family holds multiple permits and vessels that represent our life's work and retirement. If these proposals pass, we may not survive financially.

The ripple effect of reducing hatchery production would be devastating statewide. Commercial fishing supports fishermen, crew members, tenders, cannery workers, brokers, boat yards, marine trades, processors, and local businesses in Valdez, Homer, Anchorage, and beyond. Entire communities rely on this economic engine.

Reducing hatchery production by 25 percent without demonstrated scientific necessity would severely devalue investments made in good faith under Alaska's established management framework.

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

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

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,

Vicki Sue Kuller
Alaska



Frank Kelty

[REDACTED]
Palm Desert CA 92211
[REDACTED]

Date: March 2, 2026

To: Alaska Board of Fisheries Chairwoman Carlson Van Dort

From: Frank Kelty

Subject: Statewide Finfish and Supplemental Issues

Proposals 11, 163, 164,165

Chairwoman Carson Van Dort:

My name is Frank Kelty, I am writing today on behalf of myself. A little background for the for the Board of Fisheries. I lived in Unalaska for 50 years; I have now resided in my retirement home in Palm Desert CA for the last five years. I have worked in the Alaska Seafood Industry for 30 years, mostly in Unalaska as a plant manager for all Crab species and Pacific Cod. I served the Community of Unalaska as the Mayor for 12 years as a City Council member for 8 years and as a school board member for 6 years. I am a current member of the Unalaska AC and have served as the chairman in the past for over 20 years.

I am writing today in opposition to Proposal 11, 163, 164, and 165.

Proposal 11: This proposal is not necessary and should be opposed by the Board of Fisheries, there is little effort in state waters west of 170 degrees by the Amendment 80 trawl fleet, which is have observer on board 24-7. ADFG reports little bycatch of Golden King Crab, about sixty-six crabs annually. The Unalaska AC Minutes from October 2025 show that Alaska Peninsula, Aleutian Island, Bering Sea, and Chignik Pacific Cod meeting the Unalaska AC opposed Proposal 11 1-4 The paragraph below is from ADFG staff report on proposal 11.

Reported bycatch of golden king crab inside state waters west of 170° W. long by trawl gear vessels (based on ADF&G fish tickets) is low. From 2020–2025, an average of 66 golden king crab (1%) was annually reported as bycatch by trawl vessels operating inside state waters while the remaining 99% or 5,362 crab caught as bycatch were reported from vessels operating in federal waters (Table 30). Comparable federal data indicates a similar pattern of state/federal golden king crab trawl bycatch. Unobserved bycatch and mortality of golden king crab by trawl gear also occurs but is unquantified

for king crab in the Aleutian Islands. No golden king crab was reported to be caught with trawl gear in the AIS state-waters Pacific Cod fishery from 2020-2025.

I really do not think we have a problem here that needs any action by the Board of Fisheries I would urge you to oppose Proposal 11.

Proposals 163, 164, and 165: I am opposed to all three proposals. The ADFG staff report on all three proposals I agree with 100% with ADFG report staff analysis on all three of these proposals which they oppose as well.

*ADFG DEPARTMENT COMMENTS: The department is **OPPOSED** this proposal. Given the lack of specific details, the proposed intent is unactionable by the department. Developing a trawl monitoring and performance compliance program exclusive to state waters will yield limited benefits and utility relative to costs. The department recommends coordinating efforts to address trawl effects across federal/parallel fisheries with the Council, NMFS, fishery stakeholders, and state/federal fisheries law enforcement agencies prior to adopting this proposal. 1 Fishing Effects model infographic <https://meetings.npfmc.org/CommentReview/DownloadFile>*

COST ANALYSIS: Approval of this proposal will result in additional direct costs for a private person to participate in this fishery if additional monitoring, sensors, or other gear compliance verification systems are required. Approval of this proposal will result in substantial additional direct costs for the department to develop and administer a trawl gear monitoring and compliance program. Cost estimates are unavailable at this time and will depend on the final scope of the new program. As proposed, funding more than what is currently available to the department will be necessary and costs could be duplicative of current and ongoing federal efforts towards addressing similar goals.

Best Regards

A handwritten signature in black ink, appearing to read 'Frank Kelty', with a long horizontal flourish extending to the right.

Frank Kelty

Submitted by: Frank Kelty

Kelty and Associates

Community of Residence: Formerly Unalaska for 50 years now in retirement Palm Desert CA

Proposals Number 11, 163,164 and 165 all opposed

Submitted by: Lisa Gabriel

Kenai Peninsula Fishermen's Association

Community of Residence: Kenai

March 2, 2026

Opposition to Proposal 175

Alaska Board of Fisheries,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited-entry permit holders, and is a registered 501 c(6). We also include other Cook Inlet gear types, crewmembers, fish processors, local businesses, and individuals with a general interest in our membership.

The geographical area of the Eastside Setnet Fishery (ESSN) reaches from Ninilchik in the south to Boulder Point to the north, spanning more than 60 miles along Cook Inlet's Eastside. The salmon harvested by the fishery originate almost exclusively in the Kasilof and Kenai River systems. Some 440 limited-entry permit holders, each small businessperson, fish for salmon in this area and are primarily Alaska residents (86% Alaska, 80% Central Peninsula residents). The historic season usually runs from late June to August 15, but recent regulations and management have significantly shortened or closed it. Our fishery has been declared a fisheries disaster in 6 of the past 7 seasons and is under consideration for the 2025 season.

We oppose Proposal 175, submitted by the Ahtna Intertribal Resource Commission, which will be presented to the Alaska Board of Fisheries for consideration at the 2026 Statewide Finfish meeting scheduled for March 17-21, 2026, in Anchorage.

The Alaska Board of Fisheries (BOF) added commercial dipnets for the ESSN as an alternative gear type in 2024, while in the Stock of Concern for King Salmon in Upper Cook Inlet. The purpose of this change was to allow for the harvest of sockeye salmon while reducing impacts to king salmon for the purpose of king salmon recovery.

Proposal 175 seeks to change 5AAC 39.105. Types of Legal Gear which will directly reduce the legal gear for the ESSN fishery within 5AAC 21.382 Kenai River late-run king salmon stock of concern management plan. This change will reduce the only gear available to our fishermen under the commercial dip net fishery regulations in the Eastside Setnet fishery, until King salmon goals are projected in the current stock of concern management plan.

The reduced efficiency of dipnets compared to our traditional setnets is already a drastic reduction in our commercial fish harvest ability, and with the additional restrictions in Proposal 175, our fishery participants would be reduced to only the young and fit, excluding all other fishermen, family, and crew members from participating. It is discriminatory and creates extremely unsafe conditions for our fishing families.

The ability to hold a dipnet without having the assistance of the rope to hold it in some of the strongest tides in the world is beyond comprehension. The loss of gear or the risk of fishermen being pulled overboard with an unsecured net is a very real possibility. Dealing with strong tides, wind, rocks, surf, and hours in an open skiff poses many hazards for our fishermen. The line that secures the dipnet to the skiff helps minimize those hazards.

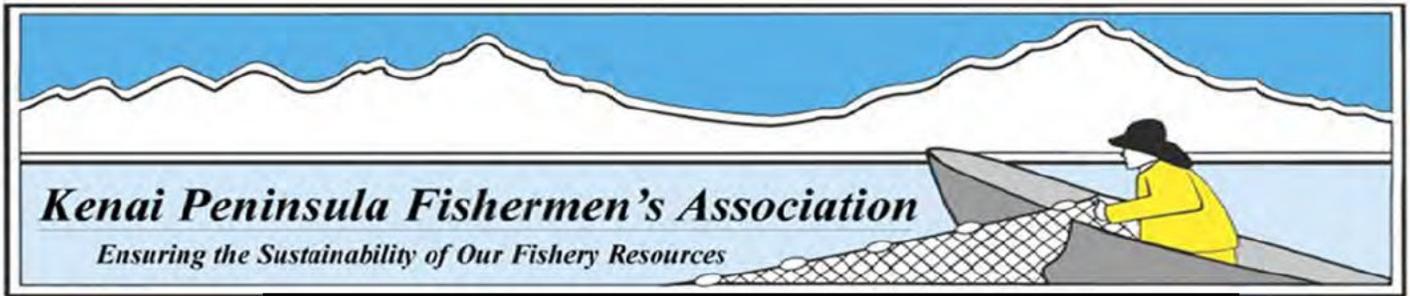
Additionally, this proposal restricts the effectiveness of our only available gear by reducing mesh size, which targets sockeye salmon, further decreasing our harvest potential for our traditional sockeye. Proposal 175 imposes stricter limits on an already struggling fishery, leading to greater instability and financial difficulties for our families and communities that depend on commercial fishing.

Dipnets already offer minimal access to the traditional sockeye salmon allocation historically harvested by Eastside Setnets for over 145 years. While current regulations on dipnets provide very limited opportunities for our fishermen, Proposal 175 would further restrict our gear and effectively eliminate our ability to meaningfully harvest fish.

Please oppose Proposal 175 for the ESSN fishing families.

Sincerely,

Kenai Peninsula Fishermen's Association Board of Directors



March 2, 2026

Opposition to Proposal 175

Alaska Board of Fisheries,

The Kenai Peninsula Fishermen's Association (KPFA) has been a commercial fishing advocacy group since 1954, primarily comprised of setnet salmon limited-entry permit holders, and is a registered 501 c(6). We also include other Cook Inlet gear types, crewmembers, fish processors, local businesses, and individuals with a general interest in our membership.

The geographical area of the Eastside Setnet Fishery (ESSN) reaches from Ninilchik in the south to Boulder Point to the north, spanning more than 60 miles along Cook Inlet's Eastside. The salmon harvested by the fishery originate almost exclusively in the Kasilof and Kenai River systems. Some 440 limited-entry permit holders, each small businessperson, fish for salmon in this area and are primarily Alaska residents (86% Alaska, 80% Central Peninsula residents). The historic season usually runs from late June to August 15, but recent regulations and management have significantly shortened or closed it. Our fishery has been declared a fisheries disaster in 6 of the past 7 seasons and is under consideration for the 2025 season.

We oppose Proposal 175, submitted by the Ahtna Intertribal Resource Commission, which will be presented to the Alaska Board of Fisheries for consideration at the 2026 Statewide Finfish meeting scheduled for March 17-21, 2026, in Anchorage.

The Alaska Board of Fisheries (BOF) added commercial dipnets for the ESSN as an alternative gear type in 2024, while in the Stock of Concern for King Salmon in Upper Cook Inlet. The purpose of this change was to allow for the harvest of sockeye salmon while reducing impacts to king salmon for the purpose of king salmon recovery.

Proposal 175 seeks to change 5AAC 39.105. Types of Legal Gear which will directly reduce the legal gear for the ESSN fishery within 5AAC 21.382 Kenai River late-run king salmon stock of concern management plan. This change will reduce the only gear available to our fishermen under the commercial dip net fishery regulations in the Eastside Setnet fishery, until King salmon goals are projected in the current stock of concern management plan.

The reduced efficiency of dipnets compared to our traditional setnets is already a drastic reduction in our commercial fish harvest ability, and with the additional restrictions in Proposal 175, our fishery participants would be reduced to only the young and fit, excluding all other fishermen, family, and crew members from participating. It is discriminatory and creates extremely unsafe conditions for our fishing families.

The ability to hold a dipnet without having the assistance of the rope to hold it in some of the strongest tides in the world is beyond comprehension. The loss of gear or the risk of fishermen being pulled overboard with an unsecured net is a very real possibility. Dealing with strong tides, wind, rocks, surf, and hours in an open skiff poses many hazards for our fishermen. The line that secures the dipnet to the skiff helps minimize those hazards.

Additionally, this proposal restricts the effectiveness of our only available gear by reducing mesh size, which targets sockeye salmon, further decreasing our harvest potential for our traditional sockeye. Proposal 175 imposes stricter limits on an already struggling fishery, leading to greater instability and financial difficulties for our families and communities that depend on commercial fishing.

Dipnets already offer minimal access to the traditional sockeye salmon allocation historically harvested by Eastside Setnets for over 145 years. While current regulations on dipnets provide very limited opportunities for our fishermen, Proposal 175 would further restrict our gear and effectively eliminate our ability to meaningfully harvest fish.

Please oppose Proposal 175 for the ESSN fishing families.

Sincerely,

Kenai Peninsula Fishermen's Association Board of Directors



March 2, 2026

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

RE: Public Comments by KRSA for Statewide Finfish and Supplemental Issues Meeting

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

Kenai River Sportfishing Association (KRSA) submits these timely public comments regarding several proposals scheduled for consideration at the Alaska Board of Fisheries Statewide Finfish and Supplemental Issues Meeting in Anchorage, March 2026. KRSA is committed to ensuring sustainable fisheries management, promoting fair access, and supporting science-based decision-making in Alaska.

Proposal #162 – Oppose We believe that all Alaskans should be eligible to participate in Subsistence fisheries. Decades of debate since the adoption of the State Subsistence Priority have failed to establish a clear and consistently implementable definition of “noncommercial customary and traditional use” as it relates to means of access. In the absence of a clear, consistently implementable definition, it is our position that access should be encouraged rather than denied, especially when the resource in question has a significant harvestable surplus.

Proposal #11 – Support KRSA supports this proposal for two primary reasons. First, we agree with the author that any non-pelagic trawling has a high probability of habitat destruction and unintended coincidental mortality of important crab resources. Second, KRSA questions whether Alaska should continue to allow trawling in any State waters.

Proposal #170 – Support We support the general concept but prefer Proposal #172 as a vehicle for addressing this important issue.

Proposal # 171 – Support This proposal was submitted by KRSA as a vehicle for the Board to address the straying of pink salmon of hatchery origin from Prince William Sound into the rivers and streams of Lower Cook Inlet.

Proposal #172 – Support This proposal was submitted by KRSA as a vehicle for putting into regulation a moratorium establishing a timeout on any further hatchery expansion in light of significant concerns and uncertainty in negative effects of current programs. This pause would allow the Alaska hatchery study time to complete its work and for current information to be incorporated into policy and practice. This action endorses and codifies an informal policy decision by the Commissioner to not permit increased egg take for pink salmon hatchery production as reported in RC240 of the 2024 Upper Cook Inlet Board of Fisheries meeting. Without Board action, this informal policy could be set aside by a future Commissioner without regard for the current scientific information on hatchery effects.

Proposal #175 – Oppose We agree with the Department that the existing 4.5-inch dip net mesh size in regulation is sufficient to reduce incidental mortality of non-target salmon. We also oppose prohibiting the attachment of dip nets to a vessel absent a clear conservation or management benefit. We believe that disallowing dip nets from being attached to vessels could create significant safety concerns.

Proposals #176 and #177 – Oppose Party boat fishing, or “pooling” of catch on board a sport fishing boat, has long been unlawful. KRSA believes this practice should remain prohibited.

Proposals #179 and #180 – Oppose KRSA supports consistently conservative management of king salmon. However, we believe that bag limits should be adopted on a regional or management plan basis rather than statewide.

Respectfully submitted,



Shannon Martin
Executive Director
Kenai River Sportfishing Association

PC247

Submitted by: Michael Kennon
Community of Residence: Homer

I am opposed to any hatchery egg permit reduction for salmon.

PC248

Submitted by: Carmen Kiiguusix
Community of Residence: Akutan

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

PC249

Submitted by: Jonathan King
Community of Residence: Anchorage

Dear Alaska BOF,

I am writing in support of Supplemental Proposal 186 which seeks to reduce harvest in mixed stock areas of Cook Inlet during large Sockeye salmon runs in an effort to preserve the health of northern district Coho stocks and associated recreational harvest opportunities. As a practicing fisheries economist, a 20+ year Alaska resident, and a recreational angler I am concerned about the health of Susitna/Little Susitna and Anchorage area Coho stocks which have failed to make escapement goals in each of the past three seasons. Over the past 20 years my family, our guests, and I have taken dozens of guided angling trips injecting thousands of dollars in our local economy. Over the past half-decade we have watch Coho harvest opportunities shrink and the number of trips we (and our guests) have taken has shrunk proportionally. When we don't fish that money leaves the Alaska economy because we purchase substitute non-fish protein not raised in Alaska and we save our angling dollars for fishing trips during our warmer climate vacations. Your actions in support of Proposal 186 will increase the chance of healthier Coho salmon stocks and keep/attract valuable dollars to Alaska's economy.

Thank you for your consideration.

PC250

Submitted by: Meghan King
Community of Residence: Cordova

I am a drifnet permit holder based in Cordova, AK and have participated in the Area E commercial salmon fisheries since 2018.

I oppose proposals 170, 172, and 187.

I support proposals 164,165,174,185, and 180.

Thank you for your time and deliberations on these matters as they affect the commercial fishing fleet of Cordova.

Meghan King, Area E driftnet permit holder

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Ben Kirk, and I am a fleet manager for Silver Bay Seafoods in Cordova, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would mean less job security and significantly less volume coming through the plant. Seeing as the company owns facilities in Seward and Valdez as well, I could see them closing the Cordova facility, as there would simply be no need to run it.

One less plant means the city earns less fish tax revenue, the power company loses a major customer, the fuel company loses boats due to fleet reduction, and the list goes on. Our towns are already struggling, and there would be businesses closing because they would lose customers who move elsewhere in pursuit of better paying jobs.

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

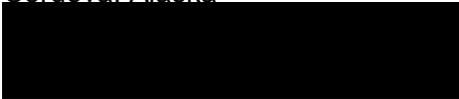
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data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

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

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

Sincerely,

Ben Kirk
Cordova, Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is David Klepser, and I am a commercial salmon fisherman in Southeast Alaska. I have fished for 40 years and was born and raised in Ketchikan, Alaska. I operate the F/V Hannah Point and the F/V No Problem.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Hatchery production provides 70 to 80 percent of my income. Hatcheries provide relief for wild stocks when they are of low abundance. Fewer hatchery fish means higher targeting of wild stock salmon.

A production loss would be an economic shortfall for our community. It would mean direct job loss and a downsizing of hatchery releases, putting further pressure on wild stocks. SSRAA has a budget of approximately \$12 million and generates economic benefits of approximately \$52 million. That figure should be considerably more now.

These proposals would lead to the devaluation of state salmon permits and loss of vessel value. At every turn, they would put higher reliance on wild stocks and reduce fishing time and area, again making Alaska's salmon industry less attractive.

It is ill-advised to disrupt a hatchery program that has done exactly what it was designed to do — providing a resource to help protect wild salmon and provide the needed stability to make the industry better. Hatcheries have been a benefit to all users, from sport to subsistence to commercial.

In-river pollution and politics are the real issues that need addressing. Without the hatcheries, a lot of fishermen would be out of business. The stability they provide is the reason salmon is still a desirable occupation.

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

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

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

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

Sincerely,

David Klepser
Ketchikan, Alaska



March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Donald Klepser, and I am a commercial and sport fisherman based in Ketchikan, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. A reduction in egg take would produce lower harvest levels, causing income instability. My livelihood is greatly tied to the production of hatchery fish.

With lower harvest, local communities would see a negative economic impact. Sport fishermen, both commercial charter operators and personal anglers, would see lowered bag limits. Many of the hatcheries provide king and coho salmon as well, which are largely produced for the sport industry. King and coho are the most expensive fish to produce, and with lower pink and chum production, the cost recovery models will not work and the king and coho programs will be discontinued. This would greatly affect the sport industry. The commercial salmon fisherman already faces a difficult time trying to survive between high fuel costs, high insurance premiums, and the cost of maintaining vessels and gear. With any hatchery reduction, fishermen and communities will see negative impacts.

A reduction in hatchery production by legislative action rather than science-based decision-making would open the door for other groups to attack any industry based on emotions and not science.

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

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

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,

Donald Klepser
Ketchikan, Alaska



Kodiak Island Tribal Coalition Foundation

"A Strong, Unified Tribal Voice for Our Future."



BOARD OF DIRECTORS AND MEMBER TRIBES

Freddie Christiansen, Chair
Alutiiq Tribe of Old Harbor

Natasha Hayden, Vice Chair
Native Village of Afognak

Chrislyn Hoen, Secretary
Tangirnaq Native Village

Alexandria Troxell
Sunaq Tribe of Kodiak

Kerry Ivory
Native Village of Ouzinkie

Richard Henson
Larsen Bay Tribe

Teacon Simeonoff
Alutiiq Tribe of Akhiok

Alicia Andrews
Karluk IRA Council

Stephanie Brenteson
Kaguyak Village

Gerad Godfrey
Native Village of Port Lions

Alaska Board of Fisheries
1255 W 8th Street
P.O. Box 115526
Juneau, AK 99811-5526

Re: Opposition to Proposals 170, 171 and 172

Dear Madam Chair and Board members:

The Kodiak Tribal Coalition represents Kodiak's tribes on fisheries issues. We have reviewed Board of Fisheries proposals 170, 171 and 172 and recommend that the Board take no action on these proposals.

Proposals 170 and 172 are comprehensive, one size fits all proposals. Proposal 170, for example, would likely eliminate village coho and sockeye imprint programs in Ouzinkie and Port Lions that supply subsistence fish to both communities. Moreover, it would substantially reduce fishing opportunities for our tribal fishermen. A 25% reduction in Kodiak Regional Aquaculture Association's production would only increase the number of fish the Association would need for cost recovery and thereby reduce or eliminate the common property fishery for our tribal fishermen.

Proposal 172 is equally problematic. Kodiak Regional Aquaculture Association has wanted to incrementally expand enhancement projects on the East Side of Kodiak Island and specifically projects that would provide additional fish and fishing opportunity to fishermen working out of Old Harbor and Akhiok. For several years Old Harbor has been working to fund a hydro-electric project that would provide a year-around water source to support a small hatchery in Old Harbor – a hatchery has been planned for decades once the hydro project is completed. The blanket moratorium envisioned in proposal 172 would stop these types of important enhancement projects and will harm Kodiak's tribal members and Kodiak's rural villages.

Finally, proposal 171 specific to Prince William Sound is best addressed by the Board and the Department of Fish and Game during the Prince William Sound board meeting. It's fact specific to that region.

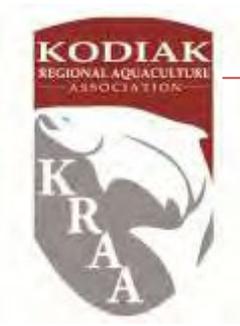
If you have any further questions regarding Kodiak Tribal Coalition's opposition to proposals 170, 171 and 172 please do not hesitate to contact Alexandria Troxell at

[REDACTED]

Quyanaa,

Freddie Christiansen, Chairman

Natasha Hayden, P.E., Vice Chairwoman


www.kraa.org

To: Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

March 2, 2026

RE: Proposals 170, 171, 172

TO: Chair Carlson-Van Dort and members of the Alaska Board of Fisheries,

Kodiak Regional Aquaculture Association (KRAA) would like to thank the Board for this opportunity to comment on and voice our **opposition to Proposals 170, 171, and 172** for the upcoming Statewide meeting of the Board of Fisheries in Anchorage.

These proposals, taken together, are simply a continuation of the senseless and arbitrary litany of proposals, mostly from the same authors, that have barraged the aquaculture associations and the Board since 2018. Not once in the last 8 years has the Board action to support one of these proposals. The proposals before the Board at the upcoming meeting have no greater merit, sounder footing, adequate regulatory framework, measurable objectives or outcomes, or supportable scientific foundation sufficient to inspire an outcome inconsistent with the Board's previous decisions to take no action on hatchery proposals.

In evaluating the proposals now before the Board, we ask that you also consider the very real harm that will be inflicted on the communities, the economy, and all the salmon users in Kodiak, Cook Inlet, Prince William Sound, and throughout Southeast Alaska should the Board elect to implement any one of them. The nature of these proposals would effectively insert the Board in any and all decision-making related to hatcheries and hatchery permits. It would upend the consistency and reliability of the process such that there would be no clear metrics for programs to secure their future, no ability to plan beyond the current year, no financial stability or framework that may not be disrupted, and no manner in which an association could be assured of their long-term viability.

Opposition to Proposal 170

At each turn and in each region, the Board has rejected arbitrary, damaging, and unsupported cuts to hatchery production. Once again, in the form of proposal 170, there is neither more

evidence nor a solid rationale supporting the author's contentions. The science cited doesn't hold up to deeper scrutiny and has both an answer and a counter in the submissions made by the aquaculture associations for this and other meetings (See submissions by the PNP hatchery operators' group). The lack of rationale for this proposal is further demonstrated by data and information provided by ADF&G related to the Alaksa Hatchery Research Project, Salmon Ocean Ecology Program, and other topics & publications.

In addition to overall lack of merit, we have discussed many times the limits of the Board's authority and that there is no instance wherein a hatchery permit or permit number is stipulated in regulation. Permits are issued individually based on regional, stakeholder-driven decision-making and oversight by scientists and experts at ADF&G. The permitting process requires multiple levels of review, public process through Regional Planning Teams, and, by Statute, authority lies firmly in the hands of the Commissioner of ADF&G for ultimate approval.

As with previous proposals of this type, it is necessary to point out that the proposed cut to pink and chum salmon production has no basis or foundation for the percentage of the proposed cut. It's a completely arbitrary percentage with no stated expected outcome other than a desire for less hatchery production. What analysis was conducted to determine this percentage will be sufficient to produce a desired result beyond "less"? What benefit will be conveyed? How is that quantified? What is the measure of success? These questions have not been answered, and in fact, it appears uncertain what actual problem the Board would be addressing by approving such a proposal.

What we do know about the outcome of this proposal, should it be passed by the Board, is the harm that will certainly and immediately be conveyed to the people, fishers, communities and businesses across coastal Alaska from Ketchikan to Kodiak. ADF&G Staff comments submitted for this meeting cite a 10-year average ex-vessel value of approximately \$23 million for the fish that would be lost by approval of this proposal. When you factor multiplier effects of the loss of \$23 million dollars flowing through coastal communities as well as the loss in first wholesale value to processors, the lost jobs and the lost, related economic activity by support services, the 25% reduction in hatchery production will have an economically destabilizing effect in numerous Alaska communities.

By contrast, cutting a significant portion of Alaska hatchery pink and chum salmon production will have an almost insignificant effect on the overall biomass of pink and chum salmon in the North Pacific Ocean. Figures indicate that all salmon comprise about 4-7% of the aggregate of free-swimming organisms (such as salmon, herring, cod, pollock, crustaceans, zooplankton, and squid to name a few familiar species), or nekton, in the North Pacific Ocean. Of that 4-7% of the entire nekton, Alaska hatchery pink salmon make up about 2.5% of all salmon (0.1-0.18% of nekton) and Alaska hatchery chum salmon make up about 4% of all salmon (0.16-0.28% of

nekton). Within this context, a 25% cut to Alaska hatchery pink salmon would result in a potential 0.63% reduction in salmon biomass and a 25% cut to Alaska hatchery chum salmon production would result in a 1.0% potential reduction in biomass. In total, a 1.63% overall reduction in all salmon biomass (and a fraction of a percent of the larger nekton biomass) at the cost of the stability of Alaskan communities, Alaskan fisheries and Alaskan residents.

To simplify: to take such drastic action against hatchery programs without clear and conclusive scientific evidence supporting the need for such a reduction would be an act of deliberate harm to Alaska's fishermen and fishery-dependent communities with no clear benefit and no tangible nexus with any *potential* benefit.

Opposition to proposal 171

Proposal 171 presents concerns related to Prince William Sound hatchery fish straying into streams in Lower Cook Inlet. Alaska Hatchery operators have submitted an updated synthesis of numerous scientific papers with emphasis on empirical and mechanistic science and explores themes such as competition, straying, and species overlap. When it comes to issues of straying in Alaska, however, the work done by the Alaska Hatchery Research Project (AHRP) likely provides some of the best information to-date.

The ADF&G Special publication 18-11 cited in the proposal was provided and discussed at the December 2019 Lower Cook Inlet Board of fisheries meeting. This information is not new. Perhaps one reason more discussion has not taken place related to this information is that closer inspection of Special Publication 18-11 and the presentation provided in 2019 (slide 19) indicates that if you exclude the samples taken Tutka Lagoon and Port Graham, *where the hatcheries are located and samples taken from streams would reasonably be expected to have high proportions of strays*, for 2014-2018, the average stray proportions of the samples for those non-hatchery creeks range from 0.4% to 7.8% over that 5-year period. That's a lot less than 34%;

With that information in mind and not wishing to imply that we should not pay attention to straying, it is important to note after more than 40 years of intensive hatchery production in Prince William Sound, and presumably the presence of straying hatchery fish, as well as a relatively low level of genetic diversity throughout Gulf of Alaska pink salmon, wild stocks in Prince William Sound retain identifiable genetic stock structure. This is strong indication that, even in years where higher proportions of strays could be present, hatchery stocks are not overwhelming wild stock systems. Additionally, there is no evidence that intermittent straying of hatchery fish into Lower Cook Inlet streams has had deleterious impacts on pink salmon populations or productivity in that region.

Beyond the facts or how data is presented, Proposal 171 is also problematic for its failure to provide a basis for the proposed 2% straying limit outside the long-argued and acknowledged-to-be arbitrary figure in the Prince William Sound Comprehensive Salmon Plan. The suggested mechanism to reduce straying is absent beyond “require changes” in production. It does not acknowledge the wide variability in stray proportions present in samples from year to year. It offers no implementable regulation or implementation scheme, acknowledges no timeframe, and it offers no measurable variables, no scientific review mechanism, and gives no supportable scientific basis. It claims a problem it does not support with evidence, proves no fact and offers no solution.

Opposition to Proposal 172

As simple as I can make it, this proposal, too, claims a problem that does not exist and offers an unnecessary and un-implementable “solution,” for which the Board does not have clear authority. The ability and authority to make decisions about issuance of hatchery permits and defined permit levels lies with the Commissioner of ADF&G. If we acknowledge that, there seems no viable option for Board action related to this proposal.

The contention of this proposal is that the AHRP may not be complete and thus the initial study could still be ongoing at the completion of the current Commissioner’s tenure. Thus “something must be done” to constrain the, presumably, out of control hatchery operators from seeking huge production increases for pink and chum salmon immediately upon appointment of a new commissioner. The record doesn’t support that.

Should the Alaska Hatchery Research Project put forward conclusions that point to the need for programmatic and/or policy change, the Department has the authority to enact that level of change. The fact remains that the current process is vigorous, has checks and balances, allows for public process, and is not in need of unnecessary and unwarranted regulation designed to create and reinforce a false perception of problematic hatchery programs gone wild. There is no evidence to support this notion, and production increases have been few and far between in the last decade as most programs have reached their maturity. Additionally, the bar is already set very high for a facility to seek and support a permitted production increase. There are multiple levels of review, opportunity for public input, and the Commissioner has to approve each request. The permitting process for a new facility or new production has a bar that is set even higher.

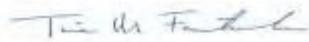
At this point in time, Hatchery operators have agreed with the Commissioner that production increases are not on the table for pink and chum salmon; however, we vehemently oppose this proposal because, should the Board take action to promulgate regulations for a moratorium, that action would, in effect, insert the Board in decisions on hatchery production and operation. It would then open the door to the possibility that the Board could then promulgate regulations to

regulate hatchery operations not just in that way, but in every way. Side-stepping the clearly defined process and authority that exists in Statue would create a level of uncertainty in our operations and result in crisis for our organization. If the process of review and reliable procedure were upended, there would be no reliability and no inviolability to our programs. Our ability to apply for funding through the Fisheries Enhancement Revolving Loan Program during times of failure, loss, or for deferred maintenance needs, which relies on cost recovery and returning fish as collateral, would become uncertain. Thus, if the programs are uncertain, financial stability would be lost. The stabilizing force that hatcheries provide for fisheries and communities and processors would be lost. Our ability to provide programs that benefit subsistence and sportfishing opportunities would be lost. Our ability to conduct rehabilitation efforts, too, would fall to the wayside.

This last, rehabilitation efforts, is a particularly keen issue in Kodiak right now where we have a Chinook salmon run at Karluk that has been a stock of concern for over a decade and that has been struggling for nearly 20 years. In the last 3 years, a total of less than 500 fish have returned to the system. All conservation measures have failed to date, including closing the entire June fishery on the Westside of Kodiak. Hatchery methods are likely the only viable option left. Losses to Kodiak and Kodiak fisheries have already been heavy. People are on the verge of losing not just their fisheries but their way of life. I know this is a story not exclusive to Kodiak, but KRAA is poised to initiate an active rehabilitation project in partnership with ADF&G and one of our local partners, Koniag, Inc. who has long shared our concerns for this stock. A rehabilitation project is a long-term commitment and will never pay for itself. Grants and soft funding won't carry it through, and the Department is subject to state funding constraints and cannot offer long-term commitment or funding support. Right now, KRAA has to consider committing funds for decades to provide for this project. And right now, with our programs and our regulatory structure at stake, our ability to make that commitment is compromised by the uncertainty these constant proposals have introduced.

The net effect of Proposals 170, 171, and 172, individually or together would be a de-stabilizing effect not just on the hatcheries but on the aquaculture associations themselves. They put not just the programs but the people and whole communities at risk. The legislature created these programs and the aquaculture associations to provide benefit to all salmon users in our region. It is our hope the Board will reject these proposals and let us get on with it.

Thank you for the opportunity to submit these comments.



Tina Fairbanks
Executive Director



The Kodiak Seiners Association, KSA, is writing in strong opposition to **Proposal 170**. Adoption of this proposal would dramatically reduce fishing opportunity for the Kodiak seine fleet, putting dozens of vessels out of business and resulting in a cascade of negative economic consequences for Kodiak. It is not clear what benefits would be conveyed from this proposal as no study has concluded that hatchery release volumes in the Gulf of Alaska point to the decline of any salmon population in the state, and it is even more uncertain what benefits would be derived specifically from reducing Kodiak's hatchery output. This proposal is haphazard, arbitrary and rooted entirely in speculation with the only known impacts from the proposal to be profoundly negative. KSA urges the board, once again, not to adopt this proposal.

Kodiak's hatchery program, while small compared to other regions, is a critically stabilizing component of our fishery. Our salmon fishery balances wild and hatchery stocks, relying primarily on wild production, with the strategic use of salmon enhancement to assure more reliable productivity for our fishermen and processors. We consider our fishery to be the gold standard for responsible management as demonstrated by its remarkably consistent productivity during a period where virtually every other region has seen volatility in their salmon runs. This consistency is largely contributable to a combination of a strong commitment to sustainability along with the small yet critically reliable production of our hatchery. Our hatchery chum production rarely exceeds 300,000 mature returning fish, but it has provided critical fishing opportunity fleet, especially now that our historical June sockeye fishing grounds have been closed for King salmon conservation. Similarly, our hatchery pink salmon production, which has largely gone unchanged since 1990, hovers around 6-7 million returning fish, a drop in the bucket compared to global pink salmon populations, but a lifeline for our boats and processors, especially on years of poor wild production, like 2018. Our hatchery also serves to focus seine effort away from wild stocks, creating a better distribution of the fleet and lowering the potential of exerting excessive pressure on potentially weaker stocks.

Proposal 170 lacks a strong scientific foundation, and the Board should consider what, if any, positive impacts would be conveyed from limiting Gulf of Alaska pink and chum salmon production specifically. When reviewing the limited body of scientific studies examining the impact of hatchery salmon production on wild populations, it is clear that the scientific basis for the proposal is largely overstated. There is no "smoking gun" study that demonstrates a strong correlation between GOA hatchery production and recent declines in Chum and Chinook populations in Western Alaska and elsewhere. Hatchery releases of pink salmon from Kodiak specifically, and the Gulf generally have remained stable since 1990 and are thus unlikely a driving factor in recent Chum and Chinook declines. A 2015 study by Ruggerone, "Numbers and Biomass of Natural- and Hatchery-Origin Pink Salmon, Chum Salmon, and Sockeye Salmon in the North Pacific Ocean" estimated that hatcheries produced just 15% of total pink salmon

abundance. Since that time Russian pink salmon production has exploded, essentially diluting the contribution from our hatcheries. The proposed 25% production cut, though substantial for our local fisheries, would have a negligible impact on total salmon biomass in the North Pacific Ocean. In fact, these cuts would encourage Russia to continue to increase their hatchery production and more fry would be released into a marine environment where they may actually compete with Western Alaska salmon stocks, which in turn would exacerbate the conditions that **Proposal 170** intends to improve. The Board should consider what the *actual* outcome would be from adopting the Proposal, and whether that outcome aligns with its intended purpose.

Even studies that examine a decline in salmon body size, such as Oke's "Recent declines in salmon body size impact ecosystems and fisheries", found only a "weak link" between chum and king salmon body sizes and pink salmon abundance. That same study found that

Populations from hatchery-intensive regions did not appear to show greater magnitude declines in body size compared to populations from other regions

suggesting that GOA hatchery releases also have not negatively impacted salmon body size even in the regions where releases occur.

Ultimately, closely examining the body of scientific literature addressing interactions between hatchery origin and wild salmon stocks fails to produce any conclusive results that specifically address the proposers' concerns with Gulf of Alaska hatchery releases. The claims and therefore the expectations that the proposed cuts would convey any benefits to Western Alaskan salmon stocks are unfounded and are speculative at most. In fact, as stated above, adoption of the proposal would encourage increased hatchery releases from countries in the Western Pacific, already the source of the majority of hatchery origin salmon, while hamstringing our Alaskan coastal seafood economies.

We respectfully request you reject **Proposal 170**, as it would be irrational for the Board to adopt this proposal, as there is no available science to support the claims made within the proposal.

Sincerely,

Darren Platt
KSA President

Submitted by: Soren Kokborg

Community of Residence: Cordova

My name is Soren Kokborg. I started gillnetting with my parents in Prince William Sound when I was 6. I have worked on various other fishing boats in and around Cordova for 8 years. Below are my thoughts on some of the proposals.

Proposal 170: I oppose proposal 170. It would have a huge impact on not only Cordova's economy but also affect hundreds if not thousands of families that live around Prince William Sound.

Proposal 171: I oppose proposal 171. The main bay hatcher produces a large chunk of my catch for the season, as well as providing my family with our subsistence catch for the winter.

Proposal 172: I oppose proposal 172. My community and I would lose our livelihood.

Proposal 187: I oppose proposal 187. The area is borderline unfishable during the fall and would put fishermen's lives at risk

Other proposals :

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

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

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

I support Proposal 175 – Dipnet mesh and configuration requirements:

Thank you.

Soren Kokborg



3800 Centerpoint Drive
Suite 700
Anchorage, AK 99503

February 28, 2025

Alaska Board of Fisheries

Statewide Finfish Meeting — March 17–21, 2026 | Anchorage, Alaska

Re: Opposition to Proposals 170, 171, and 172 — PNP Salmon Hatchery Program

Dear Members of the Alaska Board of Fisheries,

Koniag is a regional Alaska Native Corporation formed under the terms of the Alaska Native Claims Settlement Act of 1971. Koniag has over 4,800 Alutiiq Shareholders. Our region encompasses the Kodiak Archipelago in the Gulf of Alaska and a portion of the Alaska Peninsula. The communities in our region have traditionally been dependent on fisheries resources for subsistence and commercial purposes for centuries. Koniag has been working diligently on issues affecting the viability and sustainability of the village communities of the Kodiak Archipelago and access to fisheries is a critical component of this effort. For our people, salmon is not only an economic resource — it is a cultural and nutritional foundation that has sustained Alutiiq communities for thousands of years.

Koniag respectfully submits this letter in strong opposition to Proposals 170, 171, and 172 scheduled for consideration at the upcoming Statewide Finfish Meeting. Koniag believes these proposals would cause serious, unjustified harm to the hatchery program that supports fisheries in our region and to the communities that depend on them.

Proposals 170, 171, and 172 would collectively impose a mandatory 25% statewide egg take reduction, region-specific production cuts in Prince William Sound, and an indefinite moratorium on any future increases in pink and chum hatchery production. Together, these actions would fundamentally dismantle a program that has operated responsibly for 50 years under rigorous state oversight — without demonstrating that hatcheries are causing the conservation harms the proposals allege.

Koniag opposes these proposals for three fundamental reasons:

- **No scientific justification.** None of the three proposals demonstrates a causal link between hatchery production and the conservation concerns they claim to address. Alaska's hatchery program is governed by a permit-based, adaptive management framework administered by ADF&G that continuously monitors and adjusts production based on data. These proposals would replace that proven system with blunt, arbitrary regulatory mandates — including a 25% production cut with no scientific basis for that number.

- **Direct harm to the Kodiak region and our Shareholders.** Kodiak's PNP hatcheries enhance fishing opportunities for commercial, sport, subsistence, and personal use fishermen across the Kodiak Archipelago, including sockeye, coho, and Chinook programs. Alaska's hatcheries support over 4,200 annualized jobs, \$219 million in annual labor income, and \$576 million in total economic output statewide. Mandatory production cuts would reduce harvest opportunity, destabilize fishing-dependent economies, and directly diminish the commercial, subsistence and personal use fisheries that Koniag Shareholders and Kodiak Island residents depend upon.
- **A dangerous precedent.** Proposal 172 would impose an indefinite moratorium with no defined review opportunities to determine whether the moratorium should be lifted therefore stifling review based on scientific data. This approach removes adaptive management tools, eliminates established public processes, including the Regional Planning Team process, and sends a damaging signal about the stability of Alaska's fisheries policy.

Our Request

Koniag respectfully urges the Board of Fisheries to reject Proposals 170, 171, and 172. Alaska does not need to abandon its science-based hatchery management system to address unsubstantiated conservation concerns. The ongoing Alaska Hatchery Research Project and ADF&G's existing adaptive management framework are the appropriate tools to guide future decisions — not preemptive, blanket restrictions imposed before harm has been demonstrated.

The Alutiiq people's connection to Kodiak's salmon runs spans millennia. Protecting programs that sustain those fisheries today is consistent with Koniag's core values, particularly our core value to "Share the Catch" and to the region we were created to serve.

Sincerely,



Shauna Hegna
President

Submitted by: Matt Kopec
Whittier Marine Charters
Community of Residence: Kasilof

Proposal 176

Proposed Amendment to 5 AAC 75.0XX – Saltwater Vessel Bag Limit

(a) Saltwater Vessel Bag Limit.

Please accept this submission in favor of proposal 176. This amendment will reduce release mortality and waste on all gamefish, but especially in the cases of rockfish and halibut.

Although rockfish release devices have proven to increase survival and I am a fan of utilizing them, they do not seem to work consistently on especially large yellow eye and other large species such as short rakers. Despite careful use with weights as large as 12lbs on a downrigger and a slow decent, these fish often resurface down current. Some common release devices are not strong enough for larger fish and sometimes there is no sign of why the release failure occurred.

Under current charter halibut regulations, when pursuing smaller fish (under 27", etc.) anglers are forced into a significant amount of sorting for a fish small enough. Furthermore, unless gear is changed while targeting these small fish (changing from the most commonly used 16/0 circle hook or a typical jig size to something significantly smaller), fish will often be hooked through the eye or through the top of the head by the standard Alaska halibut fishing hook.

If adopted, I believe that this amendment will reduce a significant amount of waste. Although I understand the argument that increased overall success could occur in some cases, in my experience, the benefits outweigh the potential downside. Additionally, this practice is realistically commonplace among unguided anglers.

Thank you for the opportunity to comment.

Matt Kopec

LINDA KOZAK

• KODIAK, ALASKA

February 27, 2026

Chair Märit Carlson-Van Dort
Alaska Board of Fisheries
Juneau, Alaska 99811

Subj: Support for Proposal 11

Chair Carlson-Van Dort and Board Members:

Proposal 11 was submitted on behalf of the F/V Alaska Trojan, and I am also personally very supportive of this proposal. We are requesting that the Board of Fisheries prohibit groundfish trawling inside state waters west of 170° W. longitude in the Aleutian Islands to protect golden king crab grounds from large factory trawl operations.

This proposal is primarily designed to address habitat concerns and associated impacts by large factory trawl vessels in the Amendment 80 fleet, which range in size from 120' to 295'. In recent years these vessels have increased their activity on golden king crab habitat, including areas where females and sub-legal crab are concentrated. The encroachment into state waters is increasing.

Habitat concerns have been expressed by the fixed gear fleet and have been brought to the NPFMC Crab Plan Team and Scientific & Statistical Committee. Among the recent research priorities identified by the North Pacific Fishery Management Council is an urgent priority to conduct studies to assess the habitat impacts of bottom trawl fisheries in federal waters.

A major problem with acquiring information on adverse impacts to golden king crab areas is that the activity is taking place at the bottom of the ocean and we cannot visibly see the destructive nature of a trawl being hauled across the bottom over and over again. There is a need to exercise caution and be conservative in how these trawl vessels are allowed to operate. Rather than needing to prove harm to the ocean floor, we need research to prove that this practice is NOT harmful. Until that time, conservative management practices are warranted.

While it is difficult to quantify adverse impacts, in 2005 the North Pacific Fishery Management Council took a precautionary position and closed over 95% of the Aleutian Islands to bottom trawling due to concerns about impacts to benthic habitat. The Alaska Board of Fisheries has not yet taken action to protect golden king crab habitat inside state

Alaska Board of Fisheries
Proposal 11
Page Two

waters in the Aleutian Islands from bottom trawl gear and this proposal provides the opportunity to provide protections from trawl impacts.

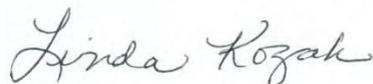
While concern for habitat protection is the primary purpose of the proposal, it is important to note that gear conflicts have been an issue and in recent years has increased. Factory trawl vessels are fishing in golden king crab areas and this has resulted in a loss of crab pots for the directed crab fishery. Even with a protocol agreement in place for notification of gear placement, factory trawlers continue to overrun crab gear forcing directed crab harvesters to move their operations. While much of this activity occurs in federal waters, there is some overlap into state waters.

There have been questions about golden king crab bycatch in the trawl fisheries. While it appears actual bycatch of golden king crab by the factory trawl vessels is minimal, we understand that observers only count whole crab as bycatch, not bits and pieces. There is significant concern about unobserved bycatch and mortality by these trawl vessels and the way they operate. While unobserved mortality cannot presently be quantified, we hear from crab harvesters that after a factory trawl vessel has been operating in an area, the directed catch of golden king crab goes down. Some of their traditional and historical areas are not as productive after trawling occurs. Did the crab leave because of the noise of the bottom trawl gear or were they crushed in the dragging process? Is their habitat impacted or destroyed?

The focus of this proposal is to exercise caution and halt fishing activity inside state waters by the large industrial factory trawl fleet targeting groundfish in the Aleutian Islands. Over 99% of their recent historical reported catch occurs in federal waters and we do not believe this action would result in a major impact on their operations, but could have a significant benefit to the golden king crab habitat and resource within state waters.

We request that the Board of Fisheries take action to prohibit large, destructive factory trawlers from fishing inside state waters in the Aleutian Islands in order to preserve and protect the important habitat for golden king crab and other species.

Thank you for reviewing and considering the proposal.



Linda Kozak

Submitted by: Michael Kramer

Community of Residence: Talkeetna

Support 170, 171, and 172.

Law re: Hatchery impacts on Wild Fish:

1974 Hatchery Act Section 1. INTENT:

"The program shall be operated without adversely affecting natural stocks of fish in the state and under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks."

5 AAC 39.222 Sustainable Salmon Policy requires that hatcheries shall operate without adversely affecting natural stocks of fish.

Comprehensive management plans state that straying should be kept to 2-3% because numbers in excess of that because over generations, mathematically beyond this the locally adapted genetics will be replaced with inferior hatchery genetics.

This has happened in many Cook Inlet streams, PWS streams and in many SE streams. Basically any wild stream within 50 miles of a release site has stray rates far in excess of 2-3% and Neither ADFG nor the RPT's they work closely with is ever going to voluntarily stop releasing fish within 50 miles of a wild stream. It is time for the board to take some meaningful action to address the statewide harm to wild fish caused by excessive hatchery production.

Contrary to ADFG's entrenched hatchery advocacy, the board should not require definitive proof of harm before hatchery practices should be critically evaluated or restrained. We make management decision all the time based on the precautionary principle and on the best available data. The best available data shows that straying rates beyond the previously acceptable 2% threshold reduces reproductive fitness and that hatchery fish compete with wild fish for limited inshore habitat and limited inshore and offshore food supplies.

One just has to look at ecosystem wide differences between even and odd years when the only obvious variable is adult hatchery pink numbers. We know in even years the food sources are poorer quality and most stocks, particularly Bristol Bay Sockeye, grow less in odd years than they do in even years.

Birds die off every odd year and killer whales do not reproduce due to nutritional stress.

The 2023 synthesis paper by Ruggerone, et al, leaves little doubt that the scientific community firmly believes hatchery fish negatively impact wild fish.

As cited in proposal 170:

"We conducted a global literature search of peer-reviewed publications (1970–2021)

evaluating how hatchery salmonids affected wild salmonids, developed a publicly available database, and synthesized results. Two hundred six publications met our search criteria, with 83% reporting adverse/minimally adverse effects on wild salmonids. Adverse genetic effects on diversity were most common, followed by effects on productivity and abundance via ecological and genetic processes. Few publications (3%) reported beneficial hatchery effects on wild salmonids, nearly all from intensive recovery programs used to bolster highly depleted wild populations. Our review suggests hatcheries commonly have adverse impacts on wild salmonids in freshwater and marine environments."

The board has avoided addressing hatchery related conservation concerns for many cycles now, instead believing that the department knows best and the RPT's will somehow police themselves.

These 3 proposals all, in various ways, request that the board address whether the current permitted levels of chum and pin egg take should be adjusted downward in light of overwhelming scientific evidence, including ADFG's own hatchery research project's conclusion that excessive straying by hatchery pinks reduce reproductive fitness in the ensuing hybrid fish by >50%.

While less research has been completed on straying hatchery chums, the board only need to look at the Crawfish Inlet debacle to recognize that excessvie Chum production, and consequent straying, have had a detrimental impact on wild fish.

While the science regarding the impact of food competition is less conclusive, the precautionary principle requires conservative management until such time as we know that competition for food does not negatively impact wild salmon.

Correlation may not always mean causation, but the precautionary principle, the policy for the management of sustainable salmon fisheries, and the Hatchery Act all mandate that hatchery shall do no harm to wild fish.

Last year, ADFG, for the first time ever, imposed a meaningful restriction on the number of fish released by a pnp. This only came in response to the predictable devastation of West Crawfish Inlet wild chum caused by massive straying of 30 million hatchery smolts which were remotely released with ADFG's blessing through a hastily approved fish transport permit request from a SE pnp.

Proposal 170 seeks a blanket 25% reduction in egg take statewide.

This is not an arbitrary number. From 2000 to 2023 permitted egg takes by PNP's increased 28% without any board (or public) consultation or involvement. The RPT process involves hatchery operators and commercial fish interests strong arming the department to allow more egg takes, and more remote release sites.

If any board member disputes this characterization, please ask the department to explain the process leading to the Crawfish release approval in 2013.

The PNP wanted to release 50 million chums, the department was worried about straying impacts on important wild index streams in West crawfish Inlet and argued that only 20 million would be acceptable. The department later agreed to 30 million.

This hasty approval by ADFG was accomplished in "record time" according to the NSRAA, despite serious concern by ADFG about negative impacts on wild stocks which were clearly established in 2018 when hatchery strays accounted for 87% of the return to the West Crawfish Inlet Wild Chum Index stream, requiring its removal from the escapement count.

The ADFG Alaska Research Research Project recently made the following conclusions:

First generation hatchery Strays have lower fitness than natural origin spawners.

Second generation offspring of hatchery strays have lower fitness (carry over effect).

The West Crawfish region (Northern Southeast Outside) has failed to meet escapement goals for several years and is now a stock of concern.

In response to the Crawfish Inlet straying problem ADFG, in 2025, mandated a 25% reduction in release numbers.

This is from DVL in RC 90 from Feb 2 2025:

"The interaction between hatchery chum salmon and wild chum salmon is not definitively known to be the cause of the wild chum salmon declined production levels, but action to reduce the presence of hatchery chum salmon in the Crawfish Inlet area in appropriate. "

"Starting in fall 2025, I will reduce the Fish Transport Permit (FTP) permitted chum salmon egg take for release at Crawfish Inlet by 25% under the Sawmill Creek

Hatchery PNP permit, from 30 million eggs to 22.5 million eggs."

Someone should ask DVL why he chose 25% as an appropriate egg take reduction.

The department also required the joint SE RPT to:

"Conduct a review of chum salmon release strategies, release numbers, and release locations and report to the commissioner by December 31, 2025, their findings and recommendations regarding what is working well, what is not working well, impacts on wild salmon stocks..."

In response, the joint RPT issued the following:

"Impacts on Wild Salmon:

See each organization's research and evaluation program sections within their addendums to better understand regional research and evaluation projects and historical programs."

NSRAA has not and will never admit that their remote releases in crawfish or elsewhere have a negative effect on wild stocks.

DIPAC and ADFG have totally ignored the fact that Fish Creek, a wild chum stream on Douglas Island has documented stray rates in excess of 50%. That stream, and hundreds more, are not producing any wild fish and have not done so for many generations, yet no one seems to care.

It should be clear that leaving egg take authority to the RPT's will not comply with laws and regulations mandating protection of wild fish from negative hatchery impacts.

I understand the board will likely review 170,171, and 172 as a block and if it takes any action at all, it will be on significantly amended version.

I also understand it has rejected a wholesale 25% reduction many times in the past and that was recently pacified by DVL's promised actions spelled out in RC90.

We can't keep waiting for "definitive proof" of negative hatchery wild interactions or keep expecting the department of RPT's to self police. If the board continues to fail to exercise its egg take authority, we will continue to replace significant wild stocks with hatchery fish and given the proven fitness reductions from hatchery gene introgression, our wild fish may never recover.

For further background on the Crawfish Inlet Issue I have attached a letter I wrote to DVL and Bill Templin to which neither responded.

Instead of giving in to the argument that a blanket approach to local straying problems is not warranted, the board might consider targeted reductions in egg takes by PWSAC, due to documented stray rates far in excess of 2-3% in Cook Inlet and PWS streams, and NSRAA for documented excessive stray rates near many of their release sites.

Is the board going to continue abdicate its egg take authority and continue standing on the sidelines while our wild salmon are systematically replaced by hatchery chums and pinks or will it enact meaningful egg take restrictions before it's too late?

Dear Doug,

Last year, you directed that the SE regional planning teams (RPT's) review their remote release sites. The Crawfish Inlet straying issue was the primary source of your concern. Following expedited approval by ADFG of a 30,000,000 remote chum release in Crawfish Inlet. straying rates in nearby wild streams exceeded 90% which required enhanced mixed stock fishing which negatively impacted 9 wild streams and lead to stock of concern status for the Northern Southeast Outer District

Here is what the Joint RPT came up with in its draft response to your concerns:

3. Impacts on Wild Salmon:

See each organization's research and evaluation program sections within their addendums to better understand regional research and evaluation projects and historical programs. It is imperative that we look at localized impacts as just that, localized, and adjust accordingly. A blanket Statewide approach to enhanced salmon production has no scientific or logical rationale. See Appendix 8 for the Alaska Hatchery Research Project information: The fishermen and industry have funded 72% of this 17.2 million dollar research project to date.

At the joint RPT meeting in early December, the joint RPT members declared that if ADFG wanted to provide a more meaningful response to you than the above, then ADFG should write it up. The addendums provided by NSRAA, SSRAA and DIPAC said nothing about any remote release site review.

Further discussion about your remote release site reviews was re-scheduled so that ADFG staff could do the work you assigned to the PNP's. Your staff added substantial information to the initial draft.

At the continued meeting on December 30, the joint RPT reluctantly agreed to the language the department wrote for them after several suggestions to soften any statements that tended to show any harm to wild fish.

Of particular interest was an attempt to scrub the only section that actually discussed remote release sites. That section reads as follows:

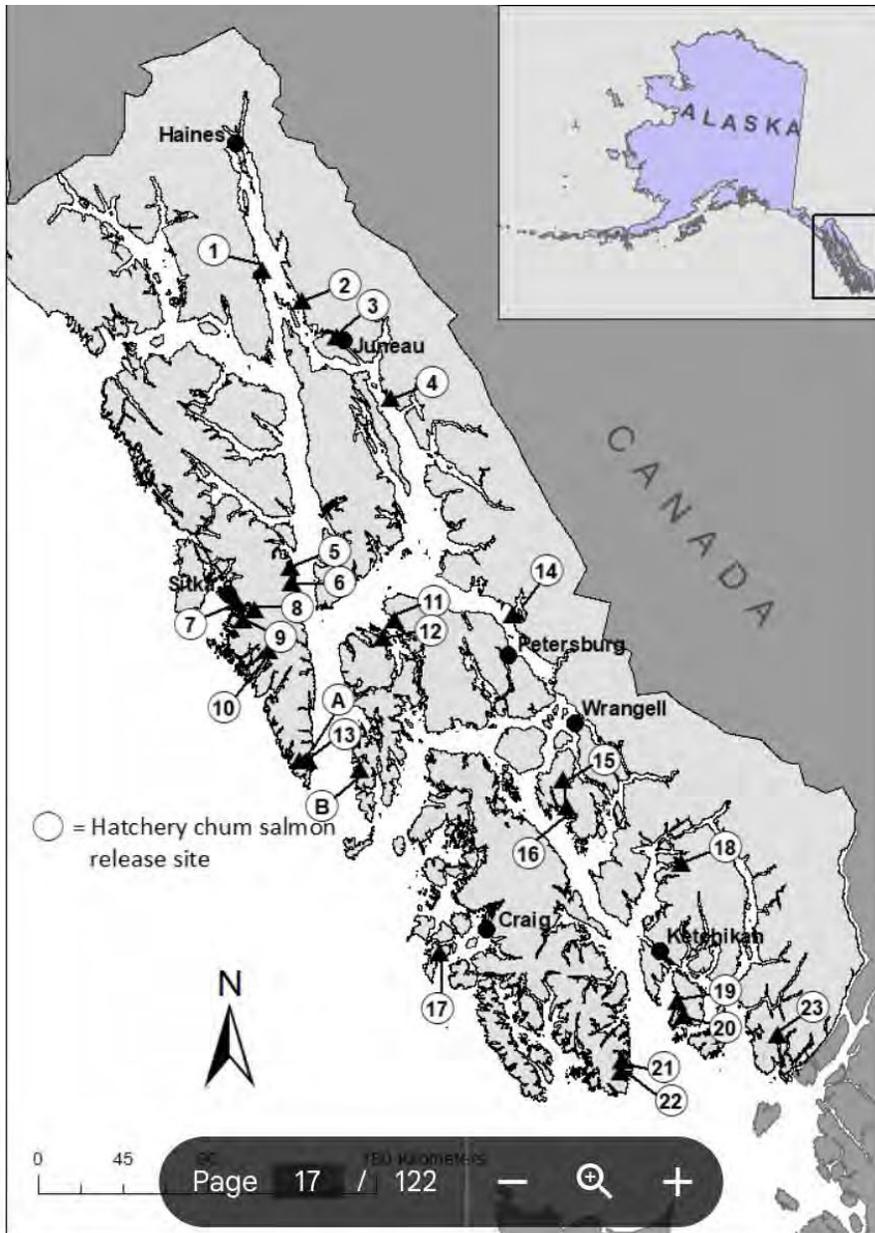
“High levels of straying of hatchery chum salmon from the

Thomas Bay release site in the NSEI subregion into Dry Bay Creek have also been documented (Piston and Heint 2020; Piston and Fish 2024). While

sampling of historical chum salmon streams near the Port Asumcion release site on the west coast of southern Southeast Alaska has not occurred due to a lack of index streams in the area, this release site was permitted based on differences in run timing between the hatchery and wild systems, which helps minimize potential interactions.”

HATCHERY CHUM SALMON STOCKS
 Hatchery production of chum salmon in Southeast Alaska has increased substantially over the past 4 decades. In 1980, hatchery operators in Southeast Alaska released 8.7 million chum salmon fry at eight locations; by 2023, this number had risen to 607 million fry released at up to 23 locations (Figures 5 and 6). Seven new release sites for chum salmon have been approved in Southeast Alaska since 2012.

Here are the locations of those 23 release sites. How could any wild streams be protected from straying?



Of the 23 remote release sites in SE, only three were even mentioned in the RPT report to you (that was drafted by ADFG).

With 23 release sites blanketing SE, Hatchery strays are going to introgress and negatively affect every wild stock in SE, and ADFG knows this:

Hatchery chum salmon straying has been studied in the region. Piston and Heintz (2012) reported in a three-year study of hatchery chum salmon straying in Southeast Alaska: “The proportion of hatchery strays decreased as distance from release sites increased. The mean proportion of hatchery strays in the 12 sampled streams located within 50 km of the nearest release site was 28.3% (range: 3.4–87.5%), and all samples that were composed of more than 40% hatchery fish were from these streams. The mean proportion of hatchery strays from streams located 50–100 km from the nearest release site was 8.0% (range: 0.0–17.8%). For streams greater than 100 km from the nearest release site, the mean proportion of hatchery strays declined to 3.3% (range: 0.0–16.6%).”

It is clear that ADFG made a huge mistake when it fast tracked the Crawfish Inlet FTP in 2013. It knew there was an important wild index stream within 20 k of the release site but blindly hoped, with no biological basis, that straying would be minimal or that different run timing would somehow mitigate the harm from straying. The average stray rate for streams within 50k was 28%

This is from the ADFG review of NSRAA’s application to approve Crawfish as a remote release site:

“Crawfish Inlet • No subsistence stocks; • No index streams and limited wild salmon production; • Outside of the Chinook high abundance area(s); • Adjacent to West Crawfish Inlet that has significant wild stock production of pink, chum, and coho salmon and provides for seine fisheries most years; • In a wilderness area; • Crawfish Inlet would provide a reasonably good sized terminal harvest area that likely would have minimal impacts on West Crawfish Inlet fisheries or other fisheries.”

https://www.nsraa.org/_pdfs/Taylor/ADFG_NSRAA_Site_selection_Request_Response_FINAL_2013.pdf

Contrary to the poorly analyzed and fast tracked decisional document from ADFG, Hatchery fish accounted for over 90% of the escapement and slightly different run timing between hatchery and wild fish made no difference. As a direct consequence of the department appeasing NSRAA’s increased release ambitions, The Wild Chum stock of West Crawfish Inlet are no longer wild and it is no longer an index stream. The fish there now are all hybrids and as we will soon see in the upcoming AHRP fitness study, they will be >50% less productive with each succeeding generation.

DIPAC has similarly wiped out the wild genetics in Fish creek on Douglas Island after multiple generations of >50% hatchery fish predictably straying into that formerly wild fish stream from Macauley hatchery. DIPAC clearly has no

interest in discussing that. As you can see in the RPT report, Dry Bay Creek now has also been irreversibly inundated with hatchery genetics due to the FTP ADFG approved for Thomas Bay in 2017.

As to the Thomas Bay and Port Asumcion remote release sites, it was discussed at the meeting that the department did not require any otolith sampling from the commercial harvest when granting the FTP's for those remote sites so we will never know how many wild fish are being scooped up. Please consider requiring otolith sampling in any future fish transport permits you authorize for remote release sites.

The below two paragraphs is standard language found in most ADFG reports involving hatcheries:

“It was understood from the beginning of the program that wild and hatchery salmon would interact for much of their lives. Consequently, policies and regulations were adopted to alleviate concerns associated with this interaction (reviewed by McGee [2004](#); Evenson et al. [2018](#)). For example, according to Alaska’s Policy for the Management of Sustainable Salmon Fisheries ([2000](#)), “effects and interactions of introduced or enhanced salmon stocks on wild salmon stocks should be assessed; wild salmon stocks and fisheries on those stocks should be protected from adverse impacts from artificial propagation and enhancement efforts.” This and other policies addressing fish health, genetics, mixed-stock fisheries, escapement goals, and regional fishery management plans require the consideration of interactions among wild- and hatchery-origin salmon. “

Straying and introgression of inferior hatchery genes into wild populations has been demonstrated by the AHRP to result in >50% relative reproductive success in PWS first generation hybrid Pinks. In January, the ADFG genetic lab will finally present its RRS findings involving first generation hybrid SE Chums.

Below is a chart from West Crawfish Inlet (WCI) remote hatchery releases showing an average 45% hatchery stray rate into a West Crawfish Inlet stream which had, until it was removed in 2025, an important ADFG wild fish index stream to

determine SE wild chum escapement. As you can see, different run timing between hatchery and wild fish has little impact on introgression and after the first generation of hybrids, these runs will simply meld together.

SE hatcheries are systematically replacing wild chums with hatchery chums or hybrids. Escapements are mostly being met by straying hatchery fish or hybrids (although there are recently listed stocks of concern caused by the Crayfish disaster).

		Est count - (new fish)	NSRAA	No Mark
13-Aug	Reach 1	200	57	143
13-Aug	Reach 2	300	125	175
13-Aug	Reach 3	100	-	100
		600	182	418
20-Aug	Reach 1	350	200	150
20-Aug	Reach 2	100	38	63
20-Aug	Reach 3	50	35	15
		500	273	228
27-Aug	Reach 1	100	81	19
27-Aug	Reach 2	50	44	6
27-Aug	Reach 3	50	8	42
		200	133	67
			588	712
			45%	55%
				1,300

Doug, it took courage for you to reduce the amount of released fish in Crawfish Inlet and to order the pnp's in SE to conduct a remote release site review. They did not take you seriously however, and your department wrote the report for them. Still, they complained about the report being too informative.

The report only discusses 3 of at least 23 release sites. SE pnp's release over 600 million chum every year. We have known for many years that straying has a huge negative impact on nearby wild streams and the AHRP will soon tell us how much introgression of hatchery genetics has forever damaged the reproductive fitness of wild fish near release sites.

Consistent with the precautionary principle, I urge you to suspend all current FTP’s in SE until the Joint SE RPT does what you ordered them to do and they actually produce a comprehensive report on all their remote release sites and their potential impacts to wild fish either through increased mixed stock fishing, or by straying. Please also consider requiring otolith sampling of commercial harvests in or near SHA’s or THA’s at remote release sites to gauge how many wild fish are being incidentally exploited in these new fisheries.

I copy your geneticist and Bill Templin with this asking that they also not sign off on any future FTP’s without first having a sound scientific basis to believe that wild stocks will not be negatively impacted. If there is any wild stocks within 100k of a release site, we know there will be at least a 3.3% stray rate. This violates all the applicable policies that should be governing hatchery releases.

Table 3.–Key elements of Alaska fisheries management policies and regulations relevant to salmon hatcheries and fishery enhancement.

Sustainable Salmon Fishery Policy (5 AAC 39.222)	
I. Management principles and criteria	
<i>Assessment of wild stock interaction and impacts</i>	As a management principle, the effects and interactions of introduced or enhanced salmon stocks on wild stocks should be assessed. Wild stocks should be protected from adverse impacts from artificial propagation and enhancement efforts.
<i>Use of precautionary approach</i>	Managers should use a conservative approach, taking into account any inherent uncertainty and risks.
Salmon Escapement Goal Policy (5 AAC 39.223)	
<i>Establishment of escapement goals</i>	Management of fisheries is based on scientifically-based escapement goals that result in sustainable harvests.
Mixed Stock Salmon Fishery Policy (5 AAC 39.220)	
<i>Wild stock conservation priority</i>	The conservation of wild stocks consistent with sustained yield is the highest priority in management of mixed-stock fisheries.
Fisheries management review of FTPs (5 AAC 41.010 – 41.050)	
<i>Review by management staff</i>	All proposed FTPs are reviewed by the regional supervisors for the Divisions of Commercial Fisheries and Sport Fish, the deputy director of Commercial Fisheries, and the local Regional Resource Development Biologist before consideration by the commissioner of ADF&G. Department staff may recommend approval or denial of the permit, and recommend permit conditions.

Thank You, Mike Kramer

Submitted by: Thaddeus Krolicki

Community of Residence: Sitka

Re: Proposals 163–165 – Types of Legal Gear (Bottom Trawling Restrictions in State Waters), Statewide Finfish and Supplemental Issues Meeting

Dear Board Members,

I strongly support a complete shutdown of bottom trawling within Alaska state waters, as proposed. No one is denying the destructive nature of bottom trawling in many parts of the world, nor claiming it is the sole cause of any fishery decline. In fact, numerous trawl fisheries have been shut down or severely restricted precisely because of their documented damage to seafloor habitats, biodiversity, and unsustainable bycatch. Prominent examples include:

- The U.S. West Coast, where more than 140,000 square miles of seafloor habitat are now closed to bottom trawling to protect essential fish habitat, corals, and sponges.
- The European Union’s 2023 action plan to end bottom trawling in all Marine Protected Areas by 2030, with leading nations like Greece (full ban by 2030, starting in national parks by 2026) and Sweden (ban adopted 2025) already acting.
- International high-seas efforts, including the 2025 IUCN resolution calling for a phase-out of bottom trawling on seamounts (now headed to the UN General Assembly).
- Ghana’s 2025 commitment at the UN Ocean Conference and new fisheries law banning bottom trawling and industrial fishing practices in expanded inshore exclusion zones.

Many other nations have taken similar steps for the same reasons. These actions show that where the science and impacts warranted it, closures happened—and one would think Alaska state waters deserve the same basic protection.

The push for blanket closures doesn’t fall short. It’s the solution. The crashing Yukon and Kuskokwim salmon runs have zero trawling inside the rivers themselves. Yet those fish must migrate straight through the Bering Sea pollock grounds where the fleet operates. Genetic testing and observer data confirm that Western Alaska Chinook and chum salmon are taken as bycatch—thousands of fish in some years—even if that represents only about 1-2% of total mortality on average. When runs are already at historic lows (with Yukon chum subsistence fisheries closed for years), even that small, human-controlled fraction removes fish that rural communities desperately need for food security. It is not the main driver—climate is far bigger—but it is one we can actually manage and tighten.

The Alaska pollock fleet is already one of the most heavily regulated and monitored in the world, with bycatch caps and 100% observer coverage in many sectors. That is true and commendable.

Yet the North Pacific Fishery Management Council recognized this reality just last month (February 2026) when it voted to establish new Western Alaska chum salmon bycatch limits and partial corridor closures in the Bering Sea pollock fishery specifically to protect subsistence users. (I personally believe the measures as adopted will not meaningfully change outcomes, but the Council’s action itself proves the data justified addressing it.)

Past effort reductions have not rebuilt stocks because climate change is the dominant factor—that is correct.

And we’re presupposing that climate factor. Presuming it is; which there’s much evidence to show that the government has failed to acknowledge natural cycles in the climate over millennia, as documented in traditional ecological knowledge that is ignored by the state of Alaska and the federal government.

We have no control over the climate; but we do have control over our behavior, and fisheries management is charged with preserving the resource for all Alaskans—not just commercial trawlers. The trawlers need to bear

the burden of conservation along with the rest of the user groups. If subsistence is zero, bycatch should be zero. Hard stop.

No one is “picking a political villain.” (Though it is curious how quickly that label gets applied whenever anyone suggests the fleet should share the pain.) Alaskans are simply asking for the same consistent, science-based approach we already apply across every other stressor: climate, hatcheries, international interception, predation, freshwater habitat loss, and the bycatch/habitat effects of trawling.

Yes, the issue feels emotional when entire villages cannot put salmon on the table while the fleet continues to haul pollock. But the science is clear: we must manage all stressors, not just the ones that do not affect one particular fleet.

Supporting a full shutdown in state waters is the right first step. Let’s not pretend otherwise.

Thank you for considering this comment and for your service on the Board.

Sincerely,

Thaddeus Krolicki

PC263

Submitted by: George Krumm

Community of Residence: Estacada, OR

George Krumm

Proposal 186 (in favor)

I am in favor of proposal 186.

It is clear that the indiscriminate harvest of northern Cook Inlet-bound coho (and other salmon) by the non-selective drift nets used to harvest (primarily) Kenai River sockeye salmon is having a growing, detrimental effect on northern Cook Inlet coho, chum and sockeye salmon. I think the status quo will result in the continued downward spiral of coho runs that used to be such a joy to sport fish and made Alaska such a great place to live-Places like the Doshka, the Little Su, the Parks Highway streams, and more. I think the continued interception/bycatch of these north Cook inlet stocks of salmon by the drift gillnetters is unsustainable, if we want to have enough coho in the streams to provide the great sportfishing we once had on these streams.

Undoubtedly, opponents to this proposal will bring up the dreaded "over-escapement " of Kenai sockeyes as a reason for shooting down this proposal. Please don't fall for that. The over-escapement model seems to be invalid as indicated by many consecutive years of Kenai River sockeye over-escapement over the past two decades. The over-escapement argument has proven to be weak at best and should not be used as justification to keep fishing sockeyes, while decimating northern Cook Inlet stocks of coho and chums through bycatch.

Sincerely,

George Krumm

Submitted by: Cale LaDuke

Community of Residence: Sitka, Alaska

Trawling is on par with fish traps that once dotted the coastline of Alaska which were well on their way to destroying whole salmon runs but luckily were outlawed years ago.

Trawling indiscriminately kill fish of all species and mammals as well. Let's not forget just a couple years ago when they killed over ten orcas in one year, while at the same time the Southeast troll fleet were in court because they might be catching a fish that an orca in Washington might eat.

There is so much waste and pollution in this fishery it's disgusting, no other user group comes close to the amount of wonton waste produced by the trawl fleet. And if they did, they would be prosecuted for it.

This should not be a hard decision to make.

This isn't about closing the trawl fishery all together, it's only about holding them accountable and keeping them within the laws that were intended for proper management.

This is why I support proposals 163,164, and 165.

Thank you for your consideration on this subject as it is extremely important to our fisheries, our economy, our livelihoods and our way of life now and for future generations.

I hope you will make the right decision.

March 2, 2026
Alaska Board of Fisheries
Statewide Finfish and Supplemental Issues Meeting

Propositions 170, 171, and 172: Opposed
Submitted by Michael Giovanni Leach

Chairman Carlson-Van Dort and Board Members:

Having grown up in Sitka, the importance of our commercial and subsistence fisheries to the community's survival was made abundantly clear to me. This is evidenced by my participation in the SE Alaska seine fishery for the past 7 years, deckhanding on the Sylvia Ann and Lucky Star through high school and college. With every intention of operating a seining vessel, I have and will depend on this fishery for my survival, along with many other fishermen.

Every season I worked, a majority of our revenue was earned through harvesting hatchery salmon. In 2025, over 80% of my employing vessel's catch were chum salmon harvested from Deep inlet. Without this cost recovery contract mediated by NSRAA, neither my captain nor crewmates would have been able to support themselves or their families. The revenue earned from hatchery salmon extends to gillnetters, trollers and seiners alike, who all rely on these fish to make a living.

The operation of all Alaskan salmon hatcheries attribute proceeds after operating costs to education and science-backed research (in partnership with ADF&G/NOAA), to support the sustainability of wild and hatchery fish synergistically. This directly contradicts the claim made by Proposition 172, saying hatcheries do not protect wild salmon from "adverse impacts from artificial propagation and enhancement efforts [5 AAC 39.222(c)(1)(D)]." Below are some standout quotes from NSRAA alone that highlight the conservative, science-backed approach they take to hatchery salmon production:

- 1.) NSRAA defines its core mission as the "utilization of the highest scientific standards' to promote the 'wise use of Alaska's salmon resources through education, sustainable harvest management, [and] the maintenance [and] protection... of high quality fish habitat.'"
- 2.) "NSRAA conducts and funds various Research projects which investigate a wide range of topics relating to salmon fisheries and biology to help us make informed, prudent decisions as fishery managers."

- 3.) “The proposals assert that hatcheries are contributing to widespread wild salmon declines through ocean competition, genetics, or ecosystem effects. However: hatchery production has been stable since 2019; declines in Chinook and chum are not uniform across Alaska; strong returns continue in many regions where hatcheries operate.”

Contrarily, Proposal 170 aims to reduce egg take by 25% statewide, without any scientific evidence to support it, and no case-specific adjustments for different areas of Alaska. This proposition is guesswork, as there are no verifications to ensure the effectiveness of it except through positive salmon population trends that already occur cyclically. This abandonment of evidence-backed decisions by ADF&G is a violation of their own sustainable salmon fisheries policies, emphasizing that “artificial propagation shall be managed conservatively with a precautionary approach in the face of uncertainty [5 AAC 39.222(c)(5)(A)].” A 25% reduction in egg take is neither conservative nor precautionary. This example set has translated into Propositions 171 and 172 with similar egg take moratoriums, created by the Kenai River Sportfishing Association, and should also be rejected as a result.

NSRAA is a small piece of a large puzzle in salmon hatchery operations statewide, and the overall 25% reduction in egg take through Proposal 170 would be detrimental to thousands of other jobs. Many processing companies and fishermen already hanging in the balance rely heavily on salmon harvests to continue operating. If we are to see a repeat of the industry’s \$1.8B in losses during 2022-2023, the additional reduced revenue from less returning hatchery salmon would result in the bankruptcy of entire processing companies and commercial fishing operations, not to mention hatcheries.

As the next generation of an already dwindling number of commercial fishermen, it is my duty to request that the Alaska Board of Fisheries make careful, science-backed decisions that protect the sustainability of salmon fisheries statewide. My dream is to own a commercial fishing operation. I rely on the salmon fisheries to survive, and if these propositions pass, my future as a commercial fisherman will no longer be realized.

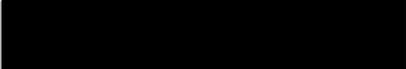
I humbly ask that the Alaska Board of Fisheries protect the commercial salmon fisheries by voting down Propositions 170, 171, and 172.

Sincerely,



Michael Giovanni Leach

Sitka, Alaska



Submitted by: Pamela Leask

Community of Residence: KETCHIKAN

TRAWLING SHOULD BE BANNED IN ALL STATE WATERS & OFFSHORE FEDERAL WATERS. THE DESTRUCTUCTION OF HABITAT, ECOSYSTEMS & EVERYTHING FROM THE SEABED TO THE SURFACE. OUR PEOPLE ARE STARVING BOTH INTERIOR & COASTAL, TO ALLOW TRAWLING TO CONTINUE IS KILLING ALL OUR RESOURCES. ANYONE WHO SUPPORTS THIS CARNAGE SHOULD BE ASHAMED. BAN TRAWLING, QUIT STICKING YOUR HEAD IN THE SAND BY IGNORING THE REAL UPIMPACTS.

Submitted by: Grace Lee

Community of Residence: Cordova, AK

My name is Grace Lee and am a fisherman, fisher- wife, and proud fisher-family in our small community of Cordova, AK. As I have lived here for a decade now, I have learned a lot about commercial fishing, from fisherman to the processors to the biologists. What makes a fishery feasible and sustainable, is multifaceted. At the core of that, there is this one question: Can the product being harvested be delivered to be processed and then shipped out? If that basic requirement can't be met, there is no fishery, even if there is abundance in the species. I oppose Proposal 187. The set net fishery on the Tsiu and Khaliak rivers is a small, local fishery with only 4 vessels activity fishing at the peak within a 6 week season. Currently, they have to travel upwards to 17 hours to haul back fish to the nearest processor, delivering in Cordova, AK. This requires very specific timing as the stage of the tides and the bar coming out of the river can be very challenging. Let alone the other dynamics such as river currents, weather, ocean swell, icebergs and other fishing debris. Why would it be even considered to restrict and push these four fishing vessels up river where more challenges are met during active fishing as well as during transportation, when there is no biological numbers, science or hardship to allocate more to the sport fishing along those same rivers? Is there a current inability or lack of catch that is facing the sport fishing community in the Tsiu and Khaliak rivers because of four fishing vessels? Would putting pressure on them without any evidence be setting a dangerous precedent when it seems that "more fish for us" is the intent and not the proclaimed issues from the change of the mouth of the confluence? If this proposal was due to recent changes in the mouth of the river, then why was almost an identical proposal submitted in 2016 from the same person? It appears to me that this comes from a place of greed instead of science backed allocative planning. The fisherman, fishing family's, processors and biologist, who's job is to manage this exact fishery and make the best calls, all agree that this Proposal 187 is treading towards dangerous territory and should be shut down immediately.

I oppose Proposals 170, 171, 172 as there is no scientific evidence these hatchery cuts would benefit the pink salmon run and regional based management decisions for hatcheries is the more exact way to operate.

I support Proposals 164, 165, 174, 175 and 180. Specifically, proposal 180 continues the conservation efforts of King Salmon and would equalize the efforts for all user groups—not just in the commercial fisherman who have already been greatly constrained.

Thank you,

Grace Lee

My name is Jason Lee, and have been a resident of Cordova, AK for about 20 years. I oppose proposals 170, 171, 172, and 187. I will focus my comments on 187 as I commercial and sport fish both the Tsiu and Kailiakh rivers since 2017. Set netting in the Kaliakh is a primary means to my livelihood. These rivers are remote and logistics to participate in these fisheries are as technical as they come by Alaska standards. As a group of 4, along with our deckhands, we have attempted to boat out our fish from these rivers to market, instead of preserve, salt or fly out fish, which were done in the past. As catch records show, we strongly favor fishing in the Kaliakh river. The Tsiu River is shallow where jet skiffs are needed to navigate. Commercial fishing in Tsiu river has a history of intense conflict dating back decades before our time. And as far as I am concerned, I do not desire to commercial fish in the Tsiu River. I have not launched a skiff in the Tsiu river for several years now. I mention this because this has been my compromise, something I personally already gave up (and our group as well) to keep peace with sport fishermen and lodges on the Tsiu. I have tried to be understanding of their needs, and also it has been easy enough to simplify our operations and thus have focussed solely on set netting in the KALIACH river. Nevertheless I am opposed to closing the Tsiu River altogether, and I urge you to weigh this matter carefully as approval 187 would be cutting off future generations from their ancestral, cultural and commercial fishing identities-these being the youth of Yakutat and Cordova areas.

Specifically, I would like to now direct my comments towards the KALIACH River, and describe our methodology and the unique and dynamic factors (meaning there are a lot of forces affecting logistics) that govern our pursuit to set net THE KALIACH RIVER. Again this is the river we specifically want to defend our right to fish. Proposal 187 would potentially CLOSE 820-1000 YARDS OF THE KALIACH RIVER or more depending on the shape of the confluence, width of the river, or whether or not there are multiple braids-ALL POSSIBLE SCENARIOS. This proposal is written in haste, is reckless and damaging to otherwise good relationships between us set netters and the sport fishermen we interact with and there has thus far been NO consideration of consequences to its neighboring user group, us, the Kaliakh set netters. (again we represent 4 boats and our deckhands). This type of proposal, in its essence is seeking to eliminate a user group, creates a hostile environment and should not be given consideration by the BoF, meaning it would (if adopted as written) thoroughly displace and take away reasonable opportunity to the ONE AND ONLY user group on the Kaliakh river, us. Both historically, and in recent years since 2017, there have been NO CONSERVATION OR ESCAPEMENT CONCERNS in either river, there are NO PRECEDENTS LIKE THIS SET BEFORE (rivers on the dynamic lost coast change constantly and occasionally merge to form a confluence), never has a confluence been taken up as an ACR and never has the BoF taken permanent action and SUPERCEDED ADFnG's authority to manage in season based on abundance, escapement and effort. And if this Proposal was adopted, there could be no in season REVERSAL, no matter the abundance present, in the Kaliakh river where we are the ONLY USER group present. To recap, this is a weighty matter, if adopted we could NOT safely fish in the Kaliakh, and this stock would go unused once again.

I feel it is time for a description of what we can and cannot do in this fishery, which relates to our methodology as set netters. We use modern day bow pickers to access this resource, and we

drive them from Cordova. We do NOT fly fish out, as was the previous methodology. I want to highlight to the board, the nature of this endeavor to drive a bow picker from Cordova with ice and gear, fish the Kaliakh, and return to boat the fish to market. I trust you are all aware of the dangers of traveling this long in the open and exposed gulf of Alaska, on relatively small, 2 person vessels, and this operation requires for alignment several unforgiving logistics, with the most being weather and sea state (waves): our track record of participation has been ultimately decided by whether or not it is safe to travel down and then proceed to cross the bar: the line of breakers separating the exposed ocean from the inside river. IF WEATHER allows us to make it this far and participate in this fishery, then it certainly allows planes to fly AERIAL SURVEYS. The department reports that funding for aerial surveys of the Tsiu river remains strong. Tsiu River is clear and fish are easily counted; Kaliakh has light silt and counting is difficult by air. If there was one key I would like to direct the boards attention to, it would be this. Aerial surveys are the KEY to IN-SEASON management. Aerial surveys as well as catch reports, provide the Department with run strength estimates AND ensure all user groups have adequate access to the stocks. If any restrictions on any user groups needs to occur, it should happen based on these aerial surveys, not the claims of the author of 187. Again, if weather allows us to run our boats from Cordova, it would ABSOLUTELY allow the department opportunities to fly aerial surveys. As you know, the Department restricted set netters to within 100 yards of the confluence during the 2025 season. I am not aware if there has EVER been ANY kind of restriction placed on the SPORT USER group, in the TSIU river, my guess would be there has never been any restrictions to sport harvest which speaks volumes to the strength of this run, and should be a caution to any IRREVERSIBLE or PERMANENT action taken by the Board at this time. Truly, there aren't many, if any, coho fisheries like this ANYWHERE in the state, that experience such low fishing pressure, from all user groups.

I want to elaborate a bit on our boats. They are in the 30-32 foot range. Big enough to handle open ocean travels, but small enough to be maneuverable in tight and shallow areas. When we first began fishing the Kaliakh we first tried to fish upstream in the upper reaches. We quickly found this to be extremely risky and dangerous as the river is shallow and swift. Between getting stuck and sucking up sand, overheating, and ruining our impellers with gravel, the area directly above the targeted area in prop 187, is UNFISHABLE with our boats. The only fishable section of the Kaliakh River for us, is the 'river bend' where she dumps in to the ocean. Mike Webber elaborates on this in his comments. It is a place where the river slows down, is deeper, and is quickly affected by tidal action. (We cannot pick our nets at low water.) This also happens to be the exact area that Proposal 187 targets, this represents an access to our livelihoods and I please urge you to act carefully and consider what is at stake for us and our identities, and vote this proposal down. It has been an extremely difficult circumstance to endure this process thus far and feel relatively helpless. I know in my heart there is a workable path forward through clear communication and continued and fluid oversight from the Department. The bottom line in this discussion is that there are enough fish for all user groups and no conservation concerns. I can understand frustration from all sides, that with this confluence we are suddenly neighbors, fishing 100 yards away from each other, where we used to have the river of our choice to OURSELVES. Following area biologist Richard Hoffman's request to re continue annual MEETINGS amongst stake holders will be beneficial as well.

Another key factor to be understood is that EXACT NUMBERS and data rarely occur in AREA D. What I mean is: Area D is incredibly vast, largely remote, and with rivers in close proximity to each other such as the Tsiu/Kaliakh, Italo/Akwe, or Manby Shores to name a few, management takes broad strokes to allow opportunity, and backs up actions with AERIAL SURVEYS. It is true we are intercepting Tsiu bound fish when we fish the Kaliakh River, and always have been based on the close proximity of the rivers as fish move in and out of the rivers. I can understand a small degree of initial concern from the board, which warrants closer inspection: This interception of fish occurs in a geographically SMALL AREA, WHEREBY the number of possible set nets fishing is regulated by statute 5 AAC 30.335 which sets the minimum distance between set nets at 75 yards. The Kaliakh and Tsiu join, and flow directly in to the ocean and its formidable breakers (see attached photos with yellow lines drawn and distances given for reference). The general impact of 2 set nets fishing in the Kaliakh below (and 2 set nets above) the confluence, on the overall escapement of the author's Tsiu River, is minimal, and closure of an entire 800-1000 yard section of river (above and below confluence) is CATOSTOPHIC for our operations. In other words, interception of Tsiu fish in the Kaliakh river is minimized by a short geographic distance of river, AND statute 5 AAC 30.335 limiting the amount of nets that can fish in that area. There may only be two or three set net sites downstream of the confluence, but they represent our only access to Kaliakh (and by nature some Tsiu) stocks. The impact of these fishing sites on our families livelihood is immense! 820-1000 yards of closed waters, as it relates to the Kaliakh river, at the river bend and subsequent confluence is both an arbitrary and an EXTREMELY long distance. I support the Department in closing up to 100 yards, but anything more puts our operations at risk. I'd also note in precedents of other rivers joining in area D, sport fishing has at time been concurrently closed in confluences as well. Im not asking to close sport fishing near the confluence of the Tsiu/Kaliakh rivers, rather highlighting the one sided approach that the author has presented the Board.

I'd like to add further comment on the unknown number of Tsiu fish we are catching, while fishing in the Kaliakh river. The EXACT NUMBER of Tsiu fish, though unknown, needs to be interpreted within the context of the historical carrying capacity of the Tsiu (specifically) and also the Kaliakh. Both rivers present robust historical catch and participation records dating back decades and even centuries where 30-40 permits consistently fished both of these rivers. We represent 4 permits. We are a team of 4 boats. And again, the key factor, the bottomline that you the Board of Fish, the Department, and all users can hang our hat and depend on, are the aerial surveys flown by the department. The subjective claims of one user or lodge owner, should not carry more weight to the board than the Department's database of observed escapement, as fisheries have been prosecuted for decades. Robust sport fishing opportunity occurs easily and readily as the run comes in and escapement numbers are achieved. If you have ever sport fished these rivers like my son and I have, you know it's easy to catch a coho on a rod and reel period. The water is clear and fish are easily spotted and targeted. Generally speaking, when run entry tapers at or just after peak season, we are always the first user group to leave as our thresholds of large operating overhead (namely fuel, constant machinery wear and tear, and my 17 percent deckhand) do not allow a profit. A look at our participation records

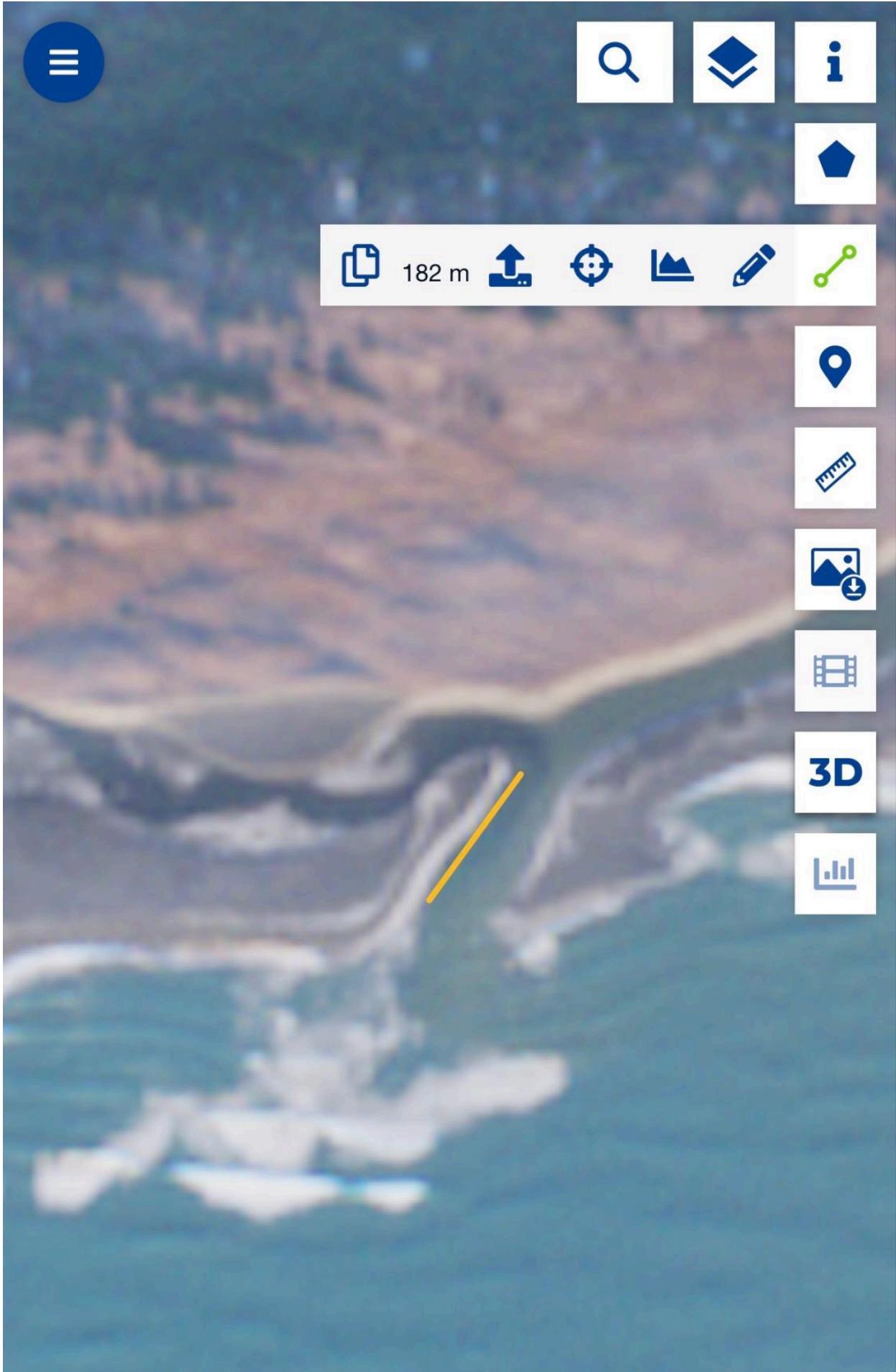
shows that we are not able to fish much after the peak of the run. This does not turn in to a 'competing for fish' situation and never has, due to that fact that if we are able to spend all that money to get down there, we are counting on enough fish to cover overhead. In lay man's term, this is NOT a scratch set net fishery. The lodge owners can speak that they are always alone to finish out the last few weeks of the season. It is also common knowledge to any set netter, that fish see our nets, and swim around for an incredibly high survival rate. The water clarity in the Kaliakh is in the ballpark of 5-6", this is enough for fish which steadily progress upstream, to see our web and turn and dart; this is commonplace. It is entirely possible that the author's motivation for Proposal 187 is based in part to perception that a set net, blocks fish from passage. Any experienced set netter knows this is not the case, and I add our testimony that we have sport fished in the Tsiu, while our nets are deployed in the neighboring Kaliakh, and have continually caught coho after coho on rod and reel.

There is no action that the board of fish could take at this meeting that would supersede or replace the efficacy of the ever changing, swift and ultimately EFFECTIVE management actions that the department HAS ALREADY SHOWN they can enact, in order to prosecute a fishery in an equitable and fair manner amongst user groups. Please carefully consider how this proposal affects the small set net user group, fishing on the geographically small section on the Kaliakh River and reject proposal 187.

We embark to set net the Kaliakh both for financial reasons as it is our livelihood, but also for spiritual reasons of adventure, pioneering and furthering the human spirit. This fishery is one that is best served to close team members, (as we have 4 in our group) and ever embodying the all for one and all for one mentality. In our pursuits we've blown motors, towed each other home in harrowing circumstances, and hauled dead bodies back to town. Enduring is the nature of the beast down in this country, but action from the Board on 187 would be insurmountable for our group to continue to pursue our livelihood.

I apologize for my lengthy comments, but until now I have worried greatly that this our unique fishery has not been entirely understood outside of our small family of fishermen, Richard Hoffman, our biologist whom we work closely with, and our close friends on the market side, Camtu's Wild Alaskan Seafoods. I hope you have found my comments helpful and sincere, as I know you all have lifetimes worth of experiences examining all sides. Please carefully read and get to know Mike Webber at this meeting; he has been our quiet spiritual leader and guide from the beginning. He provides constant insights that shape our every move, and together we form a complementary team, which is necessary for safe and ethical operation. I'll conclude that the Kaliakh fishery has been an incredible, life enriching experience and has shaped our identity as coastal Alaskans for me and my family; please oppose 187.

Attached picture shows Kalikh River on right and Tsiu River on left, yellow line represents 182 meters. This is satellite imagery from Copernicus Browser from February 2026.



182 m



Submitted by: Merrik Lee

Community of Residence: Cordova

My name is Merrik Lee, I am 11 years old and in sixth grade. I oppose proposal 187. I have a set net permit and I fish the Kaliakh river with my dad Jason Lee. For the past two years I have set netted on the Kaliakh and sport fished on the Tsiu in August before school starts. I help my dad set net and at least once a day go sport fishing on the Tsiu. It's so much fun. I earn money with my crew share and bought a new mountain bike this year. Please dont close the Kaliakh river because I hope to keep fishing for a lot more years and maybe do it when I get older. My dad says if 187 is passed we would have to fish in the breakers or up river where it is too shallow and we never go.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is William Leese, and I am a commercial fisherman in Southeast Alaska. I annually harvest fish returning to multiple hatchery sites and fish aboard the F/V Polarland through Premier Seafood Inc.

Proposals 170, 171, and 172 abandon Alaska's science-based management priorities in favor of blanket regulatory actions without clearly proven causal rationale. Collectively, they would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrative evidence. If implemented, they would damage my business viability and harm my family's livelihood as we enter our fifth generation in the fishing industry with my adult children.

These proposals would reduce harvest opportunity and create unnecessary economic instability. They represent broad-based solutions to problems for which causes have yet to be proven by the Regional Comprehensive Salmon Enhancement Plan. If there were proven damage to wild stocks or other region-specific impacts, a targeted, species- and region-specific response would be appropriate. Broad reductions without that evidence are highly suspect.

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

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

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

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

Sincerely,

William Leese
SE AK, Alaska



PC271

Submitted by: Eric Lehm

Community of Residence: Homer

I'm writing in support to proposal 176 for cumulative bag limits on saltwater vessels. This proposal seeks to make a vessel bag limit rather than individual bag limit and for times of low abundance, running charter boats this would severely decrease the number of fish that we catch and release in search of our under 27 inch fish. Thanks you

I am writing in opposition to proposal 183. As a charter operator and Homer resident, I believe that this proposal will cause severe problems for our facilities around the Homer Harbor to manage all of the extra fish carcasses that will be generated by this proposal. I believe the original intent of this proposal was retention of any fish with a size limit. Which I am in favor of, but as this is written retention of all carcasses, I'm against this proposal as written. thank you for your time.

PC272

Submitted by: Don Lesco

Community of Residence: Anchorage

I strongly encourage the board/panel to adopt Proposal 186 plan. By doing so the proposed plan 186 could boost salmon returns to all Upper Cook inlet drainage this summer and beyond

Members of the Board of Fish,

Thank you for the opportunity to provide testimony on this issue. I am the owner and operator of a 58-foot combination fishing vessel based locally in King Cove, Alaska. I have historically participated in the pollock and cod trawl parallel fisheries within state waters. I oppose proposals 163 and 164.

Data clearly show that 58-foot vessels are heavily reliant on access to state waters for pollock and cod harvest. Over a ten-year average, 95 percent of the pollock harvested in state water was by 58-foot vessels, and the historical average remains high at 86 percent. For cod, the ten-year average harvested in state water by 58-foot vessels is 91 percent, and the historical average is 89 percent. These figures demonstrate that state waters are not a marginal component of our operations—they are essential to our survival as working vessels. This is further amplified by recent restrictions passed regarding salmon opportunities on our vessel.

As a local 58-foot vessel, eliminating trawling inside state waters, in any capacity, would effectively put us out of business. Our participation in the parallel fishery is shaped by real-world constraints, including vessel size, hold capacity, safety considerations, weather limitations, and market conditions. These factors make access to trawl opportunities in state waters not only practical, but necessary for continued operation.

I would also like to address assumptions being made about trawl gear and bottom contact. The Gear Innovation Initiative (GII) is a comprehensive, ongoing project that is cataloging every pelagic trawl in Alaska. This initiative uses detailed trawl geometry and extensive variables to determine whether, and to what extent, bottom contact is occurring. While it is often assumed that 100 percent of tows in the Western Gulf make bottom contact, this assumption is simply not accurate. The GII is designed specifically to provide objective data to clarify this issue.

Given that this extensive research effort is already underway and is intended to provide factual, science-based insight into trawl performance and impacts, I respectfully ask the Board to refrain from taking action at this time. The results of the Gear Innovation Initiative will shed important light on these matters and allow for informed decision-making based on evidence rather than assumptions.

Thank you for your time and for considering the perspectives of local fishermen whose livelihoods depend on balanced, data-driven management decisions.

Respectfully,

Ben Ley

Owner/Operator, F/V Cape St Elias

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Linda Lichty, and I am a community member in the Ketchikan area. If access to fish is reduced, it would impact me and my family through reduced food availability, especially with grocery prices and taxes increasing.

If access to fish were reduced, it would also mean fewer processing workers, which would then impact my husband's job as a retail manager. It would also mean general income loss to other businesses that rely on fishermen for sales.

I think there is a risk of low fish runs that will impact us for years. Why put the cart before the horse? You have smart people doing research, and they should be able to finish before making a decision. This is a big decision that needs more research by qualified professionals.

Trawler bycatch affects all, and we should start there.

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

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

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

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

Sincerely,
Linda Lichty
Ketchikan area, Alaska



Submitted by: William Lindow

Community of Residence: Cordova

I am opposed to proposals 170, 171, and 172.

Submitted by: Trae Lohse

Community of Residence: Cordova

I strongly oppose Proposals 170 and 171. Hatcheries have become a critical part of the economic and social fabric of many coastal fishing communities in Alaska. These communities are already under pressure from rising costs of living and volatile seafood markets. Cutting Alaska's hatchery production by the drastic amounts suggested would create severe economic ripple effects; hurting commercial fishermen, processors, schools, harbors, utilities, local governments, and the many small businesses that depend on a stable fishing economy.

Reducing Alaska's hatchery output will also do nothing to address the far larger hatchery production occurring in Asia. The overwhelming majority of hatchery-origin chum salmon interacting with wild stocks in Western Alaska waters come from Japan and Russia, not Alaska. That will remain true regardless of any cuts to hatchery production made here at home.

These proposals are a shot in the dark, unlikely to improve struggling salmon runs, but certain to increase hardship for fishing families in Southeast and the Gulf of Alaska and the communities they support. Alaska should not undermine its own coastal economies with measures that offer no realistic biological benefit.

Submitted by: Tyee Lohse

Community of Residence: Cordova

170, I oppose this proposal! A 25% reduction of pink and chum hatcheries statewide. This Proposal will have rippling effects in Commercial, Subsistence, and Sport fishing. Revenue from pink and Chum salmon production funds Chinook, Sockeye and coho programs. These programs provide sport and subsistence opportunities for many Alaskans. This reduction would eliminate funding for these programs, in addition there is a large economic gain from these fish to the state and the communities that it supports. There is no unbiased science that indicates competition between hatchery pinks and wild Chinook and Chum salmon. Pink fry provide a food source for larger aggressive species. Therefore taking pressure off of wild stocks. 171, I oppose this proposal, this is an attack on commercial fisherman by a user group that wants to do anything to damage the commercial sector. The data supporting this proposal is outdated and based on one returns observations in a biased study. 172 I oppose this strictly on principle, the hatchery par request process is a strict process based on science with the state of Alaska. At this time neither the state nor the hatcheries are entertaining increases in production. 176,177,178 I oppose these proposals, bag limit needs to be per angler not per group. Bag limit is set per person. I should not be in my bunk well someone else catches my fish for me.

Submitted by: Oystein Lone

Community of Residence: Arlington Washington

Please stop all bottom trawling inside 3 miles this travesty has to stop we all know what is going on and destruction this fleet has done. It's time to put a stop to this. I'm a 35 year fixed gear Alaska fishermen I have fished Salmon all over Alaska, Hallibut Black cod Herring and just about every crab specie all with fixed gear. I have seen nothing but destruction by trawl fleet. Please stop this.

PC279

Submitted by: Cory Loos

Community of Residence: Homer

Good afternoon, I'm writing this today to oppose proposal 186. I find it very difficult to comprehend how broken the system is to even allow this major of a proposal and how severe of consequences it would cause if this passes. After the recent coho stock assessment released by the state. Science proves there is no facts that support a conservation corridor is helping or limiting the number of mix stock or cohos caught in a specific area. There is no benefits to any users groups with these corridors. If anything it's causing more harm. Operational flexibility should be taken into account, spreading out the fleet across a LARGER body of water will cause less harvest of mix stocks. Putting the fleet into smaller bodies, will cause greater harvest of those mixed stocks when they enter those smaller body's of water . Proposal 186 will force the fleet into smaller areas , the wrong areas. Science doesn't support 186. With very large runs of sockeye projected for 2026, taking action on this out of cycle will cause catastrophic results to the drift fleet which is made up of 80% local Alaskan, the the processors, the rivers and worst its setting a prescient that the board of fish cycle and the process is completely broken.

PC280

Submitted by: Christopher Lujan

Community of Residence: Anchorage

I wish to see the board of game end trawl nets that drag bottom, even so called "mid-water" trawlers.

I also wish that trawler fish caps would be set at numbers of fish, not weight.

PC281

Submitted by: Taylor Lundgren

Community of Residence: Sand Point

Dear Chairman Carlson-Van Dort and Members of the Board,

My name is Taylor Lundgren, and I am a commercial fisherman from Sand Point, Alaska. I am writing to respectfully oppose Proposals 11, 163, 164, and 165.

As a small boat owner and operator, I work on a limited budget and do not have the same financial flexibility as larger vessels. We cannot continue to conform to regulations designed for or more easily absorbed by larger operations. Additional mandates, monitoring requirements, and gear modifications place a disproportionate burden on small operators like myself who are already operating on tight margins. Our vessel already operates with a camera monitoring system in place, as well as both halibut and salmon excluders. We are already complying with strong bycatch mitigation and accountability measures. Adding further equipment mandates or redefining gear classifications would increase costs without clear biological justification, while penalizing fishermen who are already making responsible investments in conservation and compliance.

Proposal 163's redefinition of trawl gear shifts the burden onto fishermen to prove gear performance, creating unnecessary complexity and enforcement challenges. Proposal 164's mandatory bottom-contact monitoring requirements would impose costly technological mandates without clear evidence that existing management measures are insufficient. Proposal 165's additional salmon excluder requirements risk duplicating existing bycatch controls that are already among the strictest in the world.

Alaska's fisheries are among the most conservatively managed anywhere. Fishermen like myself take pride in sustainable practices because our livelihoods — and the future of our communities — depend on healthy stocks. However, continual regulatory layering without demonstrated need makes it increasingly difficult for small, community-based fishermen to survive.

I sincerely think that if the State of Alaska, and this Board continue to restrict our small Boat communities.... There should be some sort of buy back program, unless they choose to watch us go out of business slowly

I respectfully urge the Board to reject Proposals 11, 163, 164, and 165.

Thank you for your time and consideration.

Sincerely, Taylor Lundgren Sand Point, Alaska

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Michael Macaluso. I am the owner and operator of a salmon seiner for the last sixteen years, and I hold seine permits in both Prince William Sound and Chignik. My vessel is the 53-foot F/V Wave Walker.

I am a salmon fisherman, and this career has sustained my family. I have reinvested in my business over the years. With less income, I would invest less in my operation and have less income to contribute to local businesses.

If these proposals pass, they would significantly affect the livelihoods of myself, my crew, and the local businesses in Homer and Valdez where I do boat work. Less fishing opportunity and fewer fish mean less income. Communities in the Prince William Sound area would see population reductions, as people would move away in search of other jobs. The same has happened in communities such as Chignik, King Salmon, and Perryville. Commercial fishing is the lifeblood that keeps these communities going, from fishermen to the businesses that support them.

Without sound science, these major decisions would have consequences that take years to recover from. If proposals pass and are later overturned, it takes only a short time to cause severe damage and a long time to rebuild.

I have been fishing all over the state for over 25 years. I have seen both highs and lows, and in my opinion, climate and ocean conditions are the biggest factors affecting returns. Massive bird, fish, and whale die-offs are tied to warming water temperatures and broader marine changes. Blaming hatcheries is easier than addressing complex marine conditions that are much harder to change.

Hatcheries support stability throughout the state for commercial fishermen, sport fishermen, personal use harvesters, tourism, and local communities. With climate conditions in the north becoming more erratic, hatcheries help many people sustain a life from our oceans.

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

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not

respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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

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

Sincerely,

Michael Macaluso

AK


March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Schuyler Mace, and I am a commercial troller based in Sitka, Alaska. I serve as an NSRAA Board Member, At-Large Troll, and I fish aboard the F/V Marauder. These proposals would reduce fishing opportunity and create the potential for significant loss of income.

A reduction of this magnitude would mean a massive decrease in harvest opportunity for commercial gillnet, seine, and troll fisheries, and it would reduce economic revenue for the entire community of Sitka at multiple magnitudes.

With the reduction of hatchery egg take of chum salmon in Southeast Alaska, it will bleed over into the economic viability of Chinook and coho production at current levels. This will in turn lead to less hatchery contribution to the commercial troll fishery and sport fishery for Chinook and coho.

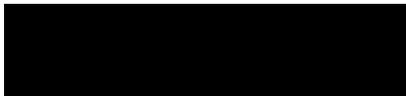
I ask the Board of Fisheries to reject Proposals 170, 171, and 172.

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

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,
Schuyler Mace
Sitka, Alaska



Submitted by: Kristen Maddox

Community of Residence: Fairbanks

I support any proposals including 163,164 and 165 which limit trawling, bycatch and stop the destruction of our sea floor habitats

Submitted by: Erica Madison

Community of Residence: King Salmon

Proposal 163:

Under the National Marine Fisheries Service and the North Pacific Fishery Management Council, midwater trawl gear or pelagic trawl gear is allowed some bottom contact. If regulators reclassify these trawls that touch the bottom anywhere from 20 to 100 percent of the time, they would be subject to the regulations of bottom trawlers. If pelagic nets are going to touch, and specifically drag the bottom, they should be subject to the same closures of bottom-trawls. They should be prohibited in areas where bottom trawling is banned.

National Marine Fisheries Service. Summary of pelagic trawl gear seafloor contact estimates for Bering Sea and Gulf of Alaska pollock fisheries, NOAA Fisheries Report, 2022, estimates pelagic trawls deployed by catcher vessels are on the bottom roughly 40% of the time and pelagic catcher-processors around 85% of the time. Alaska Marine Conservation Council. The Myth of "Mid-Water" in Alaska Pollock Fishery 2023 showed similar results with 40-80% contact of pelagic trawls and the bottom.

This substantial bottom interaction is observed enough to prompt discussion in revisiting the definition of pelagic trawling. By changing the name to what it actually is, bottom trawling, closes the regulatory gaps and gives the clear performance standard. Pelagic trawls can not drag the bottom and bottom trawls must adhere to set regulations.

Submitted by: Erica Madison

Community of Residence: King Salmon

Clear monitoring standards need to be put in place for when pelagic trawl gear contacts the seafloor. Nearshore waters harbor critical habitat for juvenile salmon, rockfish, forage fish, and crab. Habitat protection is of the highest priority to ensure the growth and wellbeing of these species down the line and therefore guaranteeing we can keep our fisheries open in the future. Intermittent bottom contact can disturb benthic habitat, and this is exactly what is happening with pelagic trawling, it is dragging the bottom 20-100 percent of the time.

Monitoring will ensure consistency in performance. Pelagic gear needs to be defined by performance in the water column, if it is dragging or touching the bottom, it must be monitored and measured. Standards for monitoring create uniform benchmarks that all trawling can be measured by and therefore fair regulations can be subsequently put in place. This will create fairness across fleets that are under strict gear restrictions and area closures.

In order to enforce any guidelines, enforcement agencies need clear data, this can only come from consistent monitoring. Data driven evidence will aid in determining pelagic trawlers compliance with verifiable records.

Submitted by: Erica Madison

Community of Residence: King Salmon

Salmon excluder devices are already widely required in the Bering Sea pollock fishery under the National Marine Fisheries Service and overseen by the North Pacific Fishery Management Council. They have been tested and appear to work as cited in these studies.

Balsiger, J. W., & Hartman, J. (2014). Final Environmental Assessment for Issuing an Exempted Fishing Permit for the Purpose of Testing a Salmon Excluder Device in the Eastern Bering Sea Pollock Fishery. NOAA/NMFS.

Balsiger, J. W., & Hartman, J. (2012). Environmental Assessment for Issuing an Exempted Fishing Permit for the Purpose of Testing a Salmon Excluder Device in the Central Gulf of Alaska Pollock Fishery. NOAA/NMFS.

NOAA Fisheries (2025). Bering Sea Pollock Fishery Exempted Fishing Permit 2025-01 Salmon Excluder Permit. NOAA/NMFS Alaska Region.

Gauvin, J., et al. (2021). Evaluating the role of bycatch reduction device design and fish behavior on Pacific salmon escapement rates from a pelagic trawl. *Fisheries Research*, 236, 105830.

With the public concern rising over declines in salmon and the potential shutdown of our beloved salmon fisheries, salmon bycatch is a "hot" topic that is not going away. Why not make minimizing unintended salmon bycatch the priority? Taking a fresh stance and doing everything possible to conserve a culturally and ecologically fundamental species in Alaska. phasing in the salmon excluder devices would do just this, and they are already required in the Bering Sea pollock fishery under NMFS and overseen by the North Pacific Fishery Management Council.

This is a solution that will help, not fix the problem. Its a start to the solution. It is a proven tool that can be a huge aide in operational stability for the trawler fleet. Why not at least try something that could save a couple salmon from their bycatch demise. It's worth a shot.

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Michael Mahoney. I am a community member of Cordova, a 25-year commercial fisherman, subsistence user, sport fisherman, and local business owner focused on recreation and tourism. I operate the F/V Dorothy G and Explore Cordova.

Reduced hatchery production could significantly impact my family's access to salmon and would have a major negative impact on my community. Less revenue would be generated and recirculated throughout our coastal economy.

This type of arbitrary and non-scientific management sets a precedent that damages our ability to continue healthy long-term management of state fishery resources.

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

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

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

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

Sincerely,

Michael Mahoney
Cordova, Alaska



Submitted by: Beau Manley

Community of Residence: Kenai

As to proposal 175. I have dip nett in cook inlet the past two years and haven't caught one king salmon. Haven't seen any one else dip net in inlet catch one. There is no Commercial dip nets in the kenai river were the kings are bottle up.no reason to reduce web mesh size. This would have a negative effect on what little oppportunity we have to catch red salmon.i Oppose proposal 175

Submitted by: Regan Mann

Cdfu, pwsac

Community of Residence: Cordova

Dear Members of the Alaska Board of Fish,

My name is Regan Mann, and I am a commercial fisherman in Prince William Sound. I strongly oppose Proposals 170, 171, and 172, which would reduce or freeze pink and chum hatchery production statewide.

As someone who fishes in Prince William Sound, I have seen firsthand how important hatchery production is to the stability of our fisheries and coastal communities. Hatchery salmon are not a fringe part of our industry — they are a core component of the economic engine that keeps working waterfronts alive.

Esther Hatchery supports a substantial share of harvest opportunity in Prince William Sound. Reducing egg take by 25% or freezing future production increase would not be a minor adjustment — it would mean fewer fish in the water, fewer openings, and less opportunity for fishermen to operate sustainably. The impacts would extend beyond fishermen to processors, tender operators, fuel docks, marine service providers, and the broader coastal economy.

These proposals would create financial instability for hatchery operations themselves by cutting cost-recovery opportunities. That threatens the long-term viability of programs that have been operating under Alaska's established management system for decades. Hatcheries are already subject to rigorous oversight and permitting by ADF&G, backed by extensive data and review. Broad, statewide mandates are not a substitute for region-specific science and adaptive management.

For commercial fishermen like me, predictability matters. Our businesses rely on consistent opportunity to make payments on vessels, permits, gear, insurance, and crew wages. Sudden production cuts would ripple through families and coastal communities that are already navigating challenging market conditions and rising costs.

Prince William Sound hatchery production supports not just commercial fisheries, but also sport, personal use, and subsistence users. Reducing hatchery output statewide risks harming all user groups without clear evidence that such broad action is warranted.

If there are regional concerns, those should be addressed with regional data and targeted solutions — not blanket reductions that impact the entire state.

For these reasons, I respectfully urge the Board to reject Proposals 170, 171, and 172.

Thank you for your time and for your service to Alaska's fisheries.

Sincerely,

Regan Mann

Commercial Fisherman, Prince William Sound

Cordova, Alaska

Submitted by: Thomas Manos

Community of Residence: Girdwood / King Cove

Finfish

I am addressing parallel fisheries in state waters. Obviously fish don't recognize the 3 mile demarcation line between State and Federal waters. This is far more complicated than appears. Conservation and allocation between user groups are important and I have been involved at both the council and the board of fish level since 1991 when I first began participating in Cod and Pollock fisheries. I strongly recommend the status quo for this meeting. Unfortunately for me as an area M resident our fishermen, and communities have given more blood than will be survivable for some. The sad piece is that it was not a reallocation, it was a misguided punishment by some members on the board that benefited no one.

I have been involved in the board process for 46 years and until now I have felt it has addressed sticky allocation issues fairly and was a necessary piece in making Alaska fisheries one of the best managed in the world. I remind you that resource management and scientific evaluation are critical and it is not expected that the BOF take those tasks on. ADF&G and NMFS has a bunch of very intelligent scientists and managers specifically tasked to address these issues. That the BOF has shown up with what seems to be a self serving agenda and the power to implement it is causing a great deal of damage to the resource, the user groups that rely on it, the Alaskan communities and the State as a whole.

Some board members should be ashamed at the self serving ignorance they bring to this process. Based on recent BOF action I believe the best course of action is for the Board to quit! You have lost your way and fairness and integrity is lost on some of you. You are causing a great deal of harm to fishers, communities and the State of Alaska.

Submitted by: Jeffrey Mans

Community of Residence: Cordova

CDFU Positions | Hatchery Proposals 170-172 | Statewide Board of Fish | March 2026

1 | Precision Management Matters

CDFU supports science-based hatchery management and thoughtful adaptation, but we oppose blunt, sweeping cuts. Hatchery adaptation requires careful, data-driven adjustments, not across-the-board reductions. In Prince William Sound, hatcheries operate as integrated systems. Chum and pink salmon aren't just commercial fish, they fu research, monitoring, recovery work, sport and subsistence opportunities, infrastructure, and decades of salmon data collection. Cutting production without a clear strategy doesn't just affect those species, it destabilizes the whole system — for all species, and all users.

Hatcheries help managers understand salmon survival and adapt resilience strategies.

Straying trends, for instance, are best addressed with precision tools such as improved imprinting, release timing, and facility-specific adjustments, not speculative egg-take cut

Questions about ocean interactions are addressed through targeted research, including food-web and plankton studies, juvenile survival tracking, cohort comparisons, and

coordinated North Pacific work. There's no clear evidence that cutting Alaska hatchery production would change current ocean dynamics. It is clear that drastic cuts would weaken Alaska's capacity for research and precision management.

2 | Shared Benefits, Regional Stewardship

Hatchery programs provide critical access for sport, subsistence, and personal use harvests while sustaining commercial fisheries that keep coastal communities working. The benefits come from decades of regional investment. In Prince William Sound, hatcheries have stabilized sockeye access for subsistence users and strengthened fishing opportunities for rural communities. Similar programs across the Gulf of Alaska provide reliable sport and subsistence access that wouldn't otherwise exist.

Hatcheries are also key tools for recovery, especially for Chinook, which are particularly climate-sensitive. As changing ocean and river conditions challenge Chinook populations, hatcheries support rebuilding through monitoring, supplementation, and research. Eroding that infrastructure undermines our ability to recover vulnerable stocks, as well as the lasting partnerships between hatcheries and local communities, including Alaska Native organizations. Hatcheries are inherently regional, shaped by local watersheds and priorities.

When communities guide local enhancement and management, outcomes are stronger.

Effective management requires strong science and regional leadership. Proposals 170, 171, and 172 weaken partnerships and recovery tools without offering workable alternatives.

See attached

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Brad Marden, and I am a commercial salmon fisherman seining for salmon in Kodiak waters. In the offseason, I live in Homer, Alaska, and I do all my boat work in either Homer or Kodiak. My fishing vessel is the F/V Renaissance, which has been fishing salmon in Kodiak since it was built in 1990.

An important fraction of the overall salmon harvest for Kodiak seiners comes from hatchery production. Reduced hatchery production would directly reduce my family's income from fishing. Even for my operation, where I often attempt to target non-hatchery fish stocks, the fishing fleet dynamics from reduced opportunities near the Kodiak hatchery would impact me negatively through more crowding in fishing areas targeting wild stocks. Fleet consolidation is a major concern for me and can make or break my ability to make a livable wage for my family.

The communities of Kodiak and Homer would certainly see negative financial effects from reduced hatchery production. Alaskan fishermen take pride in fish taxes going to our communities, and we take pride in spreading income generated from fishing to other local businesses and marine trades. On lean fishing seasons, and with harmful fishing policies, there is much less money spread within our communities.

I understand concerns about struggling fish stocks and the possibility of nutrient limitation and cross-species food competition. However, blaming hatchery production, mainly pinks, for statewide run failures of king salmon is unfair scapegoating and is not supported by adequate research. I want long-term success for all salmon species, but reducing hatchery production would cause immediate and certain harm to fishermen and coastal communities without confidence that it would achieve the desired outcomes. The guaranteed downsides of these proposals, especially Proposal 170, far outweigh speculative upsides.

The regional planning team process that is currently established and mandated is an important process and should not be abandoned in favor of an inflexible and arbitrary cap on hatchery production. The process is imperfect, but it allows for flexibility and adaptive management, which are critical bedrocks of Alaska's fisheries management success. Hatchery production helps smooth out the unpredictability of wild runs and helps spread out a fishing fleet. In many ways, hatchery production can take pressure off wild runs so that struggling runs have the chance to recover.

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

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

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

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

Sincerely,

Brad Marden
Homer, Alaska



Submitted by: Fred Marinkovich

Community of Residence: Washington

Board,

My name is Fred Marinkovich, I have been fishing in Prince William Sound for over 20 years. I am a Boat owner and an Area E permit holder.

I strongly oppose Proposals 170,171, and 172.

Hatchery production supports sport, personal use, subsistence, and commercial fishing statewide.

thank you for your time.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Bud Marrese, and I am a commercial fisherman in Southeast Alaska. I operate Buds Fisheries LLC.

These proposals would be detrimental to my income stability, business viability, and my family livelihood. The impacts would extend beyond me as well. Reduced hatchery production would reduce harvest opportunity and create ripple effects across supporting businesses and the broader coastal economy.

I am also concerned about further biased decision-making and a lack of integrity in the Board process, with Alaska fisheries management succumbing to “sounds good” hearsay. Why would we overlook proven successful hatchery operations, management, and benefits to all in varying degrees for decades? The benefits far outweigh hearsay ideas about what “should be.”

Of course, other factors are far more relevant and consequential to outcomes, and these systems are cyclical. Hatcheries have an overall track record that is impeccable when looking at how they have adapted and operated.

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

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

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,

Bud Marrese
SE Alaska, Alaska



Submitted by: Charles Martin

Community of Residence: Kodiak

Thank you madam chair and board members. My name is Charles Martin boat owner and captain of the fishing vessel Donna Rae and I do participate in the Kodiak Island jig fishery. I am informing you that I am in support of proposals 166,167 and 169 I believe these proposals will benefit all Kodiak Island jig fisherman in attempts to regulate the fisheries from illegal fishing. It is my belief that these proposals will help limit the confusion and give a better understanding of gear types that are legal and illegal to be used in The jig fisheries and may reduce the illegal harvesting of our fishery. I appreciate your understanding and consideration of these proposals. I believe these proposals will make a great impact for our future. thank you very much Charles Martin fishing vessel Donna Rae.

Submitted by: David Martin

Community of Residence: Clam Gulch, Alaska

I am strongly opposed to the Statewide Proposals 170,171 and 172. I once again have to oppose these unscientific proposals by anti-hatchery authors that are arbitrary and capricious and will be catastrophic to the Aquaculture organizations and fisheries if passed. If any of these proposals should pass, in all likelihood, it would put some Aquaculture organizations out of business, forgo stocking programs that benefit commercial, sports and subsistence fisheries and related industries. For example most all of the sockeye and coho salmon caught in the sport fishery in Resurrection Bay and the sockeye and pink sport and dip net fishery in Kachemak Bay are produced by Cook Inlet Aquaculture association. These programs would no longer be financially able to continue. The egg take permitted levels have remained consistent for years and they were scientifically, biologically and genetically developed by the State Department of Fish and Game and the Aquaculture Associations on a hatchery by hatchery bases on what is suitable to that hatchery and the local ecosystem. These proposals only quote unverified theories, that are not verified by the best reliable science. This Board has wisely rejected these types of proposals several times already and I request that they do so again. There is no new reliable science or reliable conservation concerns to approve these proposals. Thanks you,

David Martin

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Nick Martin, and I am a commercial fisherman based in Ketchikan, Alaska. I am a Southeast gillnetter operating out of Keta Bay.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would absolutely destroy my income stability, job security, and family livelihood.

They would also harm many local businesses. Fishermen would not have the money to put back into the community. If hatchery production is reduced, it would drastically impact my business and my family's livelihood. I would most likely have to find a new job.

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

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

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

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

Sincerely,

Nick Martin
Ketchikan, AK

PC297

Submitted by: Dorofey Martushev

Community of Residence: Homer

It is out of cycle. It was opposed by the department and most of the public input was against it. There is no map of what area is intended to be closed. There is no biological reason for this. There's no data for this. There's 1200 streams in the Cook Inlet and they're only looking at 2 streams in the valley as they're indicators. That didn't meet their silver count. Not acceptable.

PC298

Submitted by: Ilia Martushev

Community of Residence: Homer Alaska

oppose 186, it's out of cycle, there is no biological reason and evidence for this proposal and there is no data, there are over 1,200 river streams in the upper Cook Inlet and the 2 river systems that are used in the argument are the ones that are HEAVILY FISHED in the Valley!

PC299

Submitted by: Nikit Martushev

Community of Residence: Homer

I strongly oppose proposal 186 I have fished Cook Inlet all my life we do not catch very many silvers to be dismissing their stock that much. We are already heavily regulated barely get any openings.

PC299

Submitted by: Nikit Martushev

Community of Residence: Homer

As an Upper Cook Inlet drift gillnet fisherman, I strongly oppose Proposal 186. It guts our ability to harvest surplus Kenai sockeye by locking extra fishing time into cramped near-shore zones (Expanded Kenai, Expanded Kasilof, Anchor Point) and banning or slashing openings in broader areas like Drift Gillnet Area 1—right when strong runs (>2.3M, especially >4.6M) demand full fleet access.

This proposal is a terrible move:

Wastes abundant sockeye. Surplus fish get lost upstream instead of harvested efficiently in open water, slashing total catch, processor revenue, and community income from a proven sustainable resource.

Ignores adaptive, science-based rules. The current plan already ties openings to run strength, escapement data, and inseason management—working well for multi-user balance. Proposal 186 overrides it with unproven cuts that erode fleet viability without solid evidence linking state drifters to coho failures.

Hits livelihoods hard. This seasonal income supports families, crews, and shore businesses. Cutting prime July 16–31 time pushes more permits out of the water and threatens coastal economies.

Reject Proposal 186. Protect fair harvest of surplus sockeye, keep the fleet afloat, and demand real fixes—like better coho data and federal EEZ coordination—not knee-jerk restrictions on state commercial fishermen.
