March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Armin Reimnitz. I am a commercial fisherman in Prince William Sound and fish aboard the Anapilar.

Reducing the number of salmon available to harvest would directly impact a severely stressed Gulf of Alaska salmon seining fleet. These reductions would also directly impact processors, support businesses, and the fishing fleet that harvest America's wild salmon.

We are already under major financial pressure. Many salmon producers are on the brink of bankruptcy. The industry has been built around expected hatchery returns, and sudden broad reductions would destabilize fishing plans, processor operations, and community economies.

I also believe trawlers in the Gulf of Alaska and Shelikof Strait have impacted local salmon returns, particularly King salmon, and that those impacts warrant serious attention.

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.
Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.
Thank you for your consideration. I urge the Board of Fisheries to reject these proposals and uphold the integrity of the Alaska PNP salmon hatchery model.

Sincerely,
Armin Reimnitz

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Ray Renner, and I am a third-generation commercial fisherman, subsistence user, and local business owner participating in Prince William Sound fisheries in Cordova, Alaska. I own the F/V LZ and operate a 58-foot seiner, the Kelly Ann.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals pass, incomes, sustainability, job security, businesses, livelihoods, and our small fishing community will not survive. They will take food off of people's tables and money that pays the bills. There is no scientific reasoning behind any of this that warrants these proposals to even be considered.

Our community would be substantially affected. Cordova depends on fish tax revenue, and these proposals would take away job opportunities for a lot of people. This could cripple our commercial fishing fleet and our community by taking away opportunity that is not warranted by any scientific studies.

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

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

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

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

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Brita Restad. I was born and raised in Homer, Alaska. My family and I are subsistence users and specifically benefit from the China Poot terminal fisheries. I worked as a kayak guide in Kachemak Bay for the past six summers and have spent extensive time observing this ecosystem—experience that helped inspire my bachelor's degree in natural sciences with an emphasis in biology. Many people I respect and care about in my community depend on localized commercial fishing, and on the food web and broader ecosystem supported by salmon, for their livelihoods as well as for tourism, education, and scientific study. Many of us are deeply invested in seeing these biological systems thrive rather than struggle.

Reducing hatchery production would directly reduce the number of returning adult salmon to Kachemak Bay (among other places, but Kachemak Bay is the biological system I know best). This decrease would ripple up the food web, affecting biodiversity and species people come here to see, and it would harm Kachemak Bay's value for ecotourism and biological study.

Salmon are a keystone food for people here. Harvesting salmon provides an affordable, healthy source of protein. Without it, more of our food choices must be shipped in from out of state, increasing cost and decreasing availability. People also depend on salmon economically through commercial fishing, sport fishing, tourism, and the many forms of local work supported by healthy salmon-driven ecosystems.

Alaska has historically done a fair job balancing human pressures and natural pressures on salmon populations through data collection and adaptive feedback loops. But if populations continue to decline due to multiple factors—some within our control and some not—competition between human and natural demands will intensify. Right now, we still have the privilege of maintaining and supporting a relatively healthy ecosystem rather than trying to nurse a struggling ecosystem back to health, which is vastly more difficult, expensive, and costly in time, manpower, and sacrifices required of local communities. I urge you to examine what the decline of salmon on the Washington coast has done to their fishing industry, communities, and ecosystems.

We are facing real pressures that can negatively affect salmon populations, from warming-driven changes in upwelling and planktonic food sources for smolt, to increased human development degrading water quality in natal streams. Hatcheries are one tool we can use to support runs by improving survival during early life stages before release, while still allowing natural selection and adaptation to occur in the wild after release. This is an artificial population boost that can add robustness against adversity.

I understand concerns raised from studies of domesticated salmon in fish farms and the fear that human-managed environments could increase the frequency of traits that would otherwise be selected out in the wild. But those concerns are not automatically transferable to Alaska's hatchery model where fish are released at fry or smolt stages and face strong natural selective

pressures after release. The primary mortality risk reduced by hatchery rearing during egg and alevin stages is not selective mortality tied to individual traits—it is often stochastic. As one example that informed my understanding: Small, Maureen P., et al., “Impacts of Supplementation: Genetic Diversity in Supplemented and Unsupplemented Populations of Summer Chum Salmon (Oncorhynchus keta) in Puget Sound (Washington, USA),” *Canadian Journal of Fisheries and Aquatic Sciences* (2009).

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

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,

Brita Restad
Homer, Alaska
[redacted]

PC403

Submitted by: Andrey Reutov
Community of Residence: Homer

I believe there has to be a drastic change in trawl regulation. I fished my whole life and it is getting very hard to make a living. Because there is little fish left. And now they are threatening our salmon seasons. I know many friends and family that have suffered from these consequences.

PC404

Submitted by: George Reutov
Community of Residence: Homer, AK

I oppose a proposal 186 its just unreasonable to shut down the entire area 1 for just 2 rivers that's not even monitored or recorded, there's family life's depending on this fishery, please except my comment along with many others.

PC404

Submitted by: George Reutov
Community of Residence: Homer Alaska

I support proposal sb161,163,164,165.

Im sick and tired seeing the trawlers raping the bottom floor in our home town killing the dungeonous crab, kings, chum and we are the small time fishermen being blamed for it. please help us save our fishery and kick the out of state'ers to the curve before its to late

Thank you.

PC405

Submitted by: Greg Reutov
Community of Residence: Homer

I fished cook inlet with my dad since I was a kid and I would be devastated to see something like this happen to cook inlet if proposal 186 will go through.

I oppose proposal 186 because if area one will be shutdown permanently it will over escape the main rivers, it will be bad for cook inlets future runs and then the escapements will be poor in other main rivers. 2nd. If area one will be shutdown all the fishermen will be crunched down to smaller area to fish with this many permits, it will be a chaos out there worse then Bristol Bay. Thank you for your consideration and support 🙏.

PC406

Submitted by: Brian Riddle
Community of Residence: Anchorage

Proposals 170, 171, and 172 all are commonsense reductions to the overproduction of lower valued smelts that has led to serious admixture with wild stocks and deleterious effects on King Salmon.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Craig Ring, and I am a sport and commercial hand troller, subsistence user, and community member in Ketchikan, Alaska. I fish aboard the F/V KMZ. I am also a retired member of the U.S. Coast Guard and a member of the Ketchikan Indian Community.

It is already hard to make a living. If fish are taken out of the hold or out of our freezers, my family and elderly family members who rely on assistance will suffer. Without hatcheries, there would be less fish for local people and less food for families and elders who depend on it.

Cutting hatchery output is a lose-lose situation. There is no benefit for local communities. A lack of fish affects every business. Many people and businesses lose money, while outside interests do not bear the cost.

We have seen what happens when fish disappear, as in the 1970s, when local people went hungry. Hatcheries have helped Alaska communities and businesses recover and thrive. History shows what salmon runs looked like before hatcheries and the positive impact hatcheries have had since.

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

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

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.

Alaska Board of Fisheries
State of Alaska
Department of Fish and Game
Board Support Section

RE: Opposition to Proposal 187 – Tsiu River and Tsiu–Kaliakh Confluence Commercial Fishing Closure

Submitted by:
Regina Rioux
Terri Bogren
Damien Long
Vernon Hansen

Dear Members of the Alaska Board of Fisheries,

We respectfully submit this opposition to Proposal 187. We are Alaska Native allotment family members with direct reliance interests tied to the Tsiu River system and surrounding waters. We respect the Board process and the importance of conservation-based fisheries management. We fully support conservation-driven regulatory action when supported by clear biological evidence. If demonstrated biological data were to show that stronger restrictions are necessary to protect escapement or long-term stock sustainability, we would support those measures.

Our concern with Proposal 187 is not about avoiding regulation. Our concern is whether this proposal represents a proportional conservation response supported by sufficient biological evidence, or whether it represents a regulatory shift from adaptive conservation management toward elimination of an existing fishery without first demonstrating that existing tools cannot be modified to meet conservation needs.

The proposer is affiliated with lodge-based sport fishing interests operating within the Tsiu River system and has direct operational and economic interests in the affected area. Stakeholder participation in the regulatory process is appropriate and expected. However, proposals that substantially reallocate access to public trust resources should be supported by clear biological necessity and balanced consideration of impacts to all affected parties, including Alaska Native allotment holders and existing lawful commercial users such as our family. This comment is not intended to criticize any user group. Rather, it is intended to ensure regulatory decisions are grounded in biological data and proportional management principles.

As written, Proposal 187 functions as a reallocation of access rather than a demonstrated conservation necessity. The proposal advances a complete closure of commercial set gillnet fishing in and around the Tsiu–Kaliakh River confluence without presenting empirical biological evidence that existing regulatory tools are insufficient to meet escapement goals or protect stock health. The proposal relies on generalized assertions of increased interception risk following a reported change in river morphology but does not provide stock-specific data, modeling, or analysis demonstrating that current management measures have failed or cannot be reasonably modified to address the alleged concern.

Historically, the Tsiu River has been managed as a sensitive system through targeted regulatory tools designed to balance escapement protection with continued lawful commercial access. These tools have included reduced fishing time, gear length limitations, placement and obstruction controls, and targeted closed-water areas. Collectively, these measures represent an adaptive management framework that has allowed managers to respond to biological conditions while maintaining the long-standing commercial fishery associated with the river system.

Proposal 187 represents a significant regulatory escalation by moving directly from this historically adaptive management structure to a permanent spatial closure within the Tsiu River and a one-quarter mile radius surrounding the Tsiu–Kaliakh River confluence. At the same time, the proposal repeals existing Tsiu-specific management tools on the basis that they would no longer be necessary if the fishery itself is eliminated in the affected area. This approach bypasses evaluation of whether existing regulatory mechanisms could be modified to address the alleged change in interception risk.

If the stated concern is increased interception potential due to altered river morphology, regulatory response would typically first evaluate whether existing time, gear, and placement controls could be modified before eliminating fishery access entirely. Fishing time could be further restricted or aligned with periods of lower Tsiu stock vulnerability. Gear restrictions could be tightened through additional net length reductions, spacing requirements, or orientation standards relative to current flow. Placement controls could be modified to expand migration corridors or restrict set locations within specific channel geometry zones. Additionally, targeted seasonal or data-triggered closures could be implemented during high-risk periods rather than imposing a permanent geographic closure that applies regardless of actual in-season biological conditions.

While Proposal 187 does not eliminate all commercial fishing opportunity across the broader region, closure of the Tsiu River and the waters immediately surrounding the Tsiu–Kaliakh confluence may substantially reduce practical and economically viable fishing opportunity by removing access to a primary migration corridor and historically fishable area. In river systems where fish movement is geographically concentrated, spatial closures at key migration funnels can have effects beyond the immediate closed area.

In addition to operational impacts, continued regulatory access to traditional use waters supports long-term cultural continuity, intergenerational knowledge transfer, and future community choice to engage in traditional, commercial, or cultural uses. Even where current harvest activity may be limited or intermittent, maintaining access preserves the ability of future generations to maintain a living relationship with these waters. Regulatory actions that permanently eliminate meaningful access opportunities can therefore have impacts beyond immediate harvest activity, including effects on long-term community continuity and place-based cultural connection.

The proposed closure is geographically overbroad and untethered to demonstrated stock-specific impacts. By closing all waters within a quarter-mile radius of the confluence, the proposal applies a blanket restriction that is not narrowly tailored to actual migration patterns, timing, or interception rates and disproportionately impacts existing commercial operations and land-based interests tied to these

waters, including Alaska Native allotment reliance interests.

From a regulatory policy perspective, Proposal 187 replaces a historically flexible management framework with a static closure model. This reduces the Board's ability to respond dynamically to biological monitoring and instead establishes a fixed restriction that can only be changed through future regulatory action. Such a shift from adaptive management to permanent closure typically requires clear empirical biological evidence demonstrating that existing management tools are insufficient to meet escapement objectives.

The historical progression of management in this system further highlights the magnitude of the proposed change. Prior to the reported 2025 storm event, the Tsiu River was managed through targeted controls specifically designed to address stock sensitivity while preserving the fishery. The storm event is now cited as justification for a transition directly to full spatial closure in the confluence area and elimination of the existing regulatory toolset. The central policy question therefore becomes whether sufficient biological evidence exists to demonstrate that modification of existing tools cannot reasonably address the alleged interception risk.

We want to emphasize that we support precautionary management when supported by data. We support conservation-based fisheries management. We support adaptive regulatory changes when biological monitoring demonstrates need. Our position is that regulatory escalation to permanent closure should occur only after demonstrating that existing management tools cannot reasonably achieve conservation goals.

In the absence of such evidence, replacing adaptive management with permanent closure represents not only a conservation decision but also a significant allocation decision affecting long-standing commercial users and Alaska Native allotment–associated reliance interests tied to these waters.

For these reasons, we respectfully request that the Board not advance Proposal 187 absent clear biological evidence and a more narrowly tailored management approach.

Thank you for your time and consideration.

Respectfully,

Regina Rioux
Terri Bogren
Damien Long
Vernon Hansen

Alaska Board of Fisheries
State of Alaska
Department of Fish and Game
Board Support Section

RE: Opposition to Proposal 187 – Tsiu River and Tsiu–Kaliakh Confluence Commercial Fishing Closure

Submitted by:
Regina Rioux
Terri Bogren
Damien Long
Vernon Hansen

Dear Members of the Alaska Board of Fisheries,

We respectfully submit this opposition to Proposal 187. We are Alaska Native allotment family members with direct reliance interests tied to the Tsiu River system and surrounding waters. We respect the Board process and the importance of conservation-based fisheries management. We fully support conservation-driven regulatory action when supported by clear biological evidence. If demonstrated biological data were to show that stronger restrictions are necessary to protect escapement or long-term stock sustainability, we would support those measures.

Our concern with Proposal 187 is not about avoiding regulation. Our concern is whether this proposal represents a proportional conservation response supported by sufficient biological evidence, or whether it represents a regulatory shift from adaptive conservation management toward elimination of an existing fishery without first demonstrating that existing tools cannot be modified to meet conservation needs.

The proposer is affiliated with lodge-based sport fishing interests operating within the Tsiu River system and has direct operational and economic interests in the affected area. Stakeholder participation in the regulatory process is appropriate and expected. However, proposals that substantially reallocate access to public trust resources should be supported by clear biological necessity and balanced consideration of impacts to all affected parties, including Alaska Native allotment holders and existing lawful commercial users such as our family. This comment is not intended to criticize any user group. Rather, it is intended to ensure regulatory decisions are grounded in biological data and proportional management principles.

As written, Proposal 187 functions as a reallocation of access rather than a demonstrated conservation necessity. The proposal advances a complete closure of commercial set gillnet fishing in and around the Tsiu–Kaliakh River confluence without presenting empirical biological evidence that existing regulatory tools are insufficient to meet escapement goals or protect stock health. The proposal relies on generalized assertions of increased interception risk following a reported change in river morphology but does not provide stock-specific data, modeling, or analysis demonstrating that current management measures have failed or cannot be reasonably modified to address the alleged concern.

Historically, the Tsiu River has been managed as a sensitive system through targeted regulatory tools designed to balance escapement protection with continued lawful commercial access. These tools have included reduced fishing time, gear length limitations, placement and obstruction controls, and targeted closed-water areas. Collectively, these measures represent an adaptive management framework that has allowed managers to respond to biological conditions while maintaining the long-standing commercial fishery associated with the river system.

Proposal 187 represents a significant regulatory escalation by moving directly from this historically adaptive management structure to a permanent spatial closure within the Tsiu River and a one-quarter mile radius surrounding the Tsiu–Kaliakh River confluence. At the same time, the proposal repeals existing Tsiu-specific management tools on the basis that they would no longer be necessary if the fishery itself is eliminated in the affected area. This approach bypasses evaluation of whether existing regulatory mechanisms could be modified to address the alleged change in interception risk.

If the stated concern is increased interception potential due to altered river morphology, regulatory response would typically first evaluate whether existing time, gear, and placement controls could be modified before eliminating fishery access entirely. Fishing time could be further restricted or aligned with periods of lower Tsiu stock vulnerability. Gear restrictions could be tightened through additional net length reductions, spacing requirements, or orientation standards relative to current flow. Placement controls could be modified to expand migration corridors or restrict set locations within specific channel geometry zones. Additionally, targeted seasonal or data-triggered closures could be implemented during high-risk periods rather than imposing a permanent geographic closure that applies regardless of actual in-season biological conditions.

While Proposal 187 does not eliminate all commercial fishing opportunity across the broader region, closure of the Tsiu River and the waters immediately surrounding the Tsiu–Kaliakh confluence may substantially reduce practical and economically viable fishing opportunity by removing access to a primary migration corridor and historically fishable area. In river systems where fish movement is geographically concentrated, spatial closures at key migration funnels can have effects beyond the immediate closed area.

In addition to operational impacts, continued regulatory access to traditional use waters supports long-term cultural continuity, intergenerational knowledge transfer, and future community choice to engage in traditional, commercial, or cultural uses. Even where current harvest activity may be limited or intermittent, maintaining access preserves the ability of future generations to maintain a living relationship with these waters. Regulatory actions that permanently eliminate meaningful access opportunities can therefore have impacts beyond immediate harvest activity, including effects on long-term community continuity and place-based cultural connection.

The proposed closure is geographically overbroad and untethered to demonstrated stock-specific impacts. By closing all waters within a quarter-mile radius of the confluence, the proposal applies a blanket restriction that is not narrowly tailored to actual migration patterns, timing, or interception rates and disproportionately impacts existing commercial operations and land-based interests tied to these

waters, including Alaska Native allotment reliance interests.

From a regulatory policy perspective, Proposal 187 replaces a historically flexible management framework with a static closure model. This reduces the Board's ability to respond dynamically to biological monitoring and instead establishes a fixed restriction that can only be changed through future regulatory action. Such a shift from adaptive management to permanent closure typically requires clear empirical biological evidence demonstrating that existing management tools are insufficient to meet escapement objectives.

The historical progression of management in this system further highlights the magnitude of the proposed change. Prior to the reported 2025 storm event, the Tsiu River was managed through targeted controls specifically designed to address stock sensitivity while preserving the fishery. The storm event is now cited as justification for a transition directly to full spatial closure in the confluence area and elimination of the existing regulatory toolset. The central policy question therefore becomes whether sufficient biological evidence exists to demonstrate that modification of existing tools cannot reasonably address the alleged interception risk.

We want to emphasize that we support precautionary management when supported by data. We support conservation-based fisheries management. We support adaptive regulatory changes when biological monitoring demonstrates need. Our position is that regulatory escalation to permanent closure should occur only after demonstrating that existing management tools cannot reasonably achieve conservation goals.

In the absence of such evidence, replacing adaptive management with permanent closure represents not only a conservation decision but also a significant allocation decision affecting long-standing commercial users and Alaska Native allotment–associated reliance interests tied to these waters.

For these reasons, we respectfully request that the Board not advance Proposal 187 absent clear biological evidence and a more narrowly tailored management approach.

Thank you for your time and consideration.

Respectfully,

Regina Rioux
Terri Bogren
Damien Long
Vernon Hansen

PC410

Submitted by: Ralph Roberts
Community of Residence: Port Hardy

Am opposed to cutting hatchery production

PC411

Submitted by: Alexis Rodriguez
Community of Residence: Wasilla

162 and 175 simply oppose!!!

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Ryan Rogers. I have been a Prince William Sound salmon permit holder since 1988 and have fished continuously in Prince William Sound since 1983. I have also fished across Alaska, including Bristol Bay and the Bering Sea. I fish aboard the F/V Cat-Bil-Lu.

The hatcheries provide our fishery more stability than many other areas, which enables consistent investment into operations, crews, and communities. Reduced production would reduce that investment potential and weaken crew stability.

These proposals could negatively impact the Valdez community through reduced spending by the fleet if fishing time declines due to reduced production. They also threaten a major part of Alaska's pink salmon production that supports the broader economy. The risk of reduced returns does not make sense given the lack of clear evidence of harm. The growing demand for affordable protein should be part of the consideration when weighing incomplete science against proven production.

Approved testimonial:
"The hatcheries of PWS have been vital to my fishing success for over 40 years as well as provided me the opportunity to raise my two children with a strong work ethic providing a healthy protein for all to enjoy."

I ask the Board of Fisheries to reject Proposals 170, 171, and 172.
Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G). Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.
Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

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

Sincerely,
Ryan Rogers
Valdez, Alaska
[redacted]

Nate Rose
Kodiak, AK, 99615

March 2, 2026

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

Re: Support for Alaska's Private Non-Profit Hatchery Program, oppose proposals 170, 171, 172

Madam Chair and Members of the Board:

Thank you for the opportunity to voice my **opposition to proposal 170, 171, and 172.** My name is Nate Rose and I am a fisherman from Kodiak Alaska. I own and operate the FV June Sea built in 1988, and I currently fish for crab, cod, halibut, rockfish, and salmon over the course of the year.

I urge the board to consider **opposing** the suite of proposals attempting to control the output of hatchery production in Alaska. These proposals were written on a theoretical basis and there is no concrete evidence supporting the claim that juvenile wild stock salmon are competing for food resources with hatchery fish, however there is **measurable harm** that would be inflicted on the various user groups that benefit from the hatchery programs in Alaska, and more specifically the program here in Kodiak.

As a former board member of the Kodiak Regional Aquaculture Association that manages our local hatcheries, I can attest to the fact that the Kodiak hatcheries, both at Kitoi Bay and Pillar Creek, have been and are continuing to run programs designed to benefit **all user groups** in the Kodiak Archipelago, and beyond. KRAA has managed to create terminal harvest sockeye runs in the local villages of Ouzinkie and Port Lions, a vibrant road-system coho fishery in coordination with the Division of Sport Fish at the ADFG, a subsistence, sport and commercial fishery in Telrod Cove on the West side of Kodiak, and has helped to enhance the commercial pink and chum salmon fishery out of Kitoi bay, a mere 3.5 hours from Kodiak town.

This pink and chum salmon program provides stability to the Kodiak salmon fishery given the fact that Kodiak has always had a strong biennial pink salmon fishery, meaning it is very odd to have two strong pink salmon years back-to-back. The chum fishery, although small in relation to others around the state has been the only lifeline for salmon seiners during the month of June, as

our traditional Westside sockeye fishery has been closed due to week sockeye runs and king salmon conservation concerns.

The close proximity of the hatchery to Kodiak town, only 3.5 hours, provides opportunity for our fleet of smaller aging vessels to fish close to town in the event of mechanical or refrigeration issues. All current processing markets require refrigerated sea water systems, or RSW to chill fish, and yet most will work with fishermen if the systems are malfunctioning if those vessels commit to fishing close to town and taking ice from the cannery. During the busiest time of the season, the hatchery can support 50 seiners with everyone still making enough to justify the effort.

Funding for the Kitoi hatchery currently comes from cost recovery efforts. ADFG and KRAA staff work in coordination to achieve cost recovery in a timely fashion so that the common property fishery has the opportunity for maximum benefit of the fish resource, and I believe they do it the best out of any other partnership in the state.

These proposals to reduce egg take ability, and hamstring the hatchery programs would cut this valuable component to the Kodiak salmon fishery, without any measurable benefit to wild stocks anywhere in the state.

I respectfully request you **reject Proposals 170, 171, and 172.**

Thank you for your time and consideration, and your service to Alaska.

Sincerely,

Nate Rose

Nate Rose
Kodiak, AK, 99615

March 2, 2026

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

Re: Withdraw my support for Proposal 168, request support for Proposal 167

Madam Chair and Members of the Board:

As the author of **Proposal 168,** I withdraw my support for this proposal and respectfully request the Board focus your attention to **Proposal 167.**

Thank you for your time and consideration to this matter.

Nate Rose

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Richard Roth. I am a commercial fisherman and own and operate the F/V Sea Tzar with my wife and five children. We seine for salmon around Kodiak Island and split time between our remote cabin near Larsen Bay and the fishing season aboard our vessel.

Reducing hatchery production would significantly reduce our income, particularly in years when wild returns are low. Hatchery returns help us remain financially stable and make ends meet during difficult seasons.

Coastal communities throughout Alaska are closely tied to the fisheries. Less fish means less money circulating through communities and the state. I support long-term sustainability and believe that thorough research and clear evidence should precede any major regulatory changes.

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

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

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

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

Sincerely,

Richard Roth
Homer, Alaska / Larsen Bay, Alaska
capt.richardroth@yahoo.com

PC415

Submitted by: Steven Roth
Community of Residence: Homer

Steven Roth

I have been fishing for over 40 years in the salmon fishing Industry.

I Support HB33, if we take away the advice of those who know the area and the fishery, we are taking away the ability to hear from those who know it best, I don't ask a Airplane mechanic to fix my electrical problems at my house.

This seems like a practical and sensible way for all fisheries and user groups to be properly represented by public servants that they elected.

I fully support HB33!!!

Thank you.

Steven Roth

PC416

Submitted by: William Roth
Community of Residence: Homer

Proposal 168 Support

Reason: Makes enforcing fishing regulations simple and concise.

PROPOSAL 170: Strongly oppose

Reason: Affects the greater economy of Alaska and fiscal budgets in a negative manner and is not backed by any science or departments.

Proposal 171 Strongly oppose

Reason: Data collected to support this was collected a decade ago, with no proof of negative impact on wild stock.

Proposal 172 Strongly Oppose

Reason: Chum Salmon and Pink Salmon Make up Huge economic impact for commercial fishing, this proposal would have a vast impact on the state economy, and is bias considering that no mention of sockeye king or silver hatcheries is mentioned, if founded in science and a legitimate concern over hatchery fish was a concern for sustainability of wild stocks the kings, coho and sockeye species would be included in this proposals, but since the commercialized sport industry finds very little value in these species they want the other user groups who rely heavily on these species to be shut down.

Proposal 173 Support

Reason: Good housekeeping of current regulations.

Support 176 Support

This helps with regulation and enforcement, making current regulations simple and easy to follow.

Proposal 177: Support

Vessel pool bag limits

Simplifies regs and rules, probably happens a lot currently anyways and makes it simple and clear. However needs to be amended, where crew and captain if under hire are excluded from vessel bag limit

Proposal 178: Support

Reason: is poorly written and defined, proposal 177 takes its place which i support

Proposal 173: Support

Simplifies rules for enforcement, it is an unnecessary regulation, less polution is always a good thing and this accomplishes this and gives no major advantage to fishermen.

Proposal 186 Strongly Opposed

No Science backing this, and a large opinion pointing fingers at user groups with no data to back it up. Negatively affects the local businesses and economy.

PC417

Submitted by: Revelle Russell
Community of Residence: Homer

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

My name is Revelle Tad Russell. I live in Homer, AK. I have been commercial fishing, my main source of income, since 1994. I have been a Upper Cook Inlet Permit holder and owner/operator since 2010.

I respectfully request the Board defer acting on Proposal 186 until its regular cycle, and consider it at its March 2027 meeting.

This is an allocative issue and not a conservation issue and should not be brought up out of cycle.

Cohos in UCI are NOT a stock of concern. Both escapement goals (CEG) for the Little Susitna and the Deshka have been incomplete in in the last 7 of 10 years. The other two CEG systems are Jim Creek and Fish Creek. Jim Creek has exceeded or was within its CEG 23 out of the last 29 years. Fish Creek was the same for 27 of the last 29 years. This does not constitute permanently closing an entire area.

Proposal 186 does not meet requirements for Agenda Change Request (ACR).

When a Board of Fish member goes on public record saying "I do not want see setnets in the Inlet again - If i had my way, there'd be no setnets in the Inlet period, Drifter or setnets." When such comments are made its hard to see Proposal 186 as a conservation issue, based on science, and not an allocative one. If anything is seems punitive.

Proposal 186 is allocative and belongs in the regular cycle and should be heard next year in the regular Upper Cook Inlet cycle.

Thank you.

PC418

Submitted by: Justin Ryan
Community of Residence: Cordova

I adamantly oppose proposals 170 and 171. These are basically the same proposals they put in every year without evidence not supporting documents to show what they believe. Past boards have said they wanted to evidence to support the claims. No new evidence has been presented. They are simply throwing darts at the wall hoping the new makeup of the board will get tricked by their conjecture. I personally think these proposals are insulting to board members to have to waste their time on them without new evidence. They don’t have new evidence because

evidence does not exist. They like to use percentages in these proposals to try and trick and mislead you. Proposal 171 sited a study done from 2014-2018 saying 22% of a streams were pws hatchery fish. 22% sounds like a lot until you realize the total number of fish was like 400 fish. So 88 hatchery pinks. It's not a percentage that stays consistent with higher numbers of Cook Inlet fish. 88 hatchery would be the total if it was 10,000 Cook Inlet fish. Ask them to give you the numbers for lower Cook Inlet fish for 2025. To me there is a reason they are using data from 14-18 because they can mislead it to fit their agenda but more recent data doesn't support it so they can't include it. More recent data would show much much lower then 2% straying so they have to disregard that. More importantly then the lack of data is the amount of people this would affect if either of these were to pass. Fishermen would lose income, hatcheries would have to cut production which would cause them to cut jobs. Many of these hatcheries are already operating in slim margins and a 25% reduction would be devastating for them. The commercial fishing industry supplies to much work on so many levels. Deck hands, net menders, mechanics, engineers, boat builders, cannery workers, marketing teams, truck drivers, etc, etc. The hatcheries alone have huge numbers of employees. Hire contractors to do specialized work. Bring in mechanics. Bring in engineers. Pay for permits. Work with the coast guard and the department to do things the right way. You're not talking a handful of commercials fishermen losing income, you're talking potentially thousands of people losing jobs and income. Hatcheries also support subsistence users and sport fishermen. Hatchery fish can and do get caught by many subsistence fishermen who wouldn't have as easily accessible salmon. Sport and subsistence fishermen up and down the copper river benefit from the Gulkana hatchery putting out red salmon. Hactheries were started because these same wild stocks were failing. Subsequently the wild stocks improved. Some would say the hatcheries enhanced the wild runs. Now hatcheries haven't been doing as well and neither have the wild runs. I personally think it's pretty obvious that ocean conditions are what is affects both hatchery and wild runs. Some of the biggest returns for hatcheries also coincided with big returns for wild salmon. Some of the worst returns for hatcheries also coincided with bad returns for wild salmon. Ocean conditions change over time and when they are good for salmon we have big runs like we did in the past and then when ocean conditions are bad for salmon we have bad runs like we have been having in recent years. There is credible evidence that shows the trends of overall ocean temperature affecting salmon and that those temperatures are due to return to levels that are good for salmon. I strongly believe in the coming years that wild stocks and hatchery stocks will

Improve with the ocean conditions. Make a rush to judgement and cut down hatcheries and you'll just undermine what was going to happen naturally. I implore the board to use reality, logic and understanding of the evidence to shoot down this proposal. If you do feel like you want to support it, do yourself and all user groups a service and request better information and evidence like past boards have. If/when they don't/can't provide it you basically have no choice but to shoot down these proposals. Remember, these aren't about your personal opinions and beliefs or mine, these are for what is for the betterment of everyone and everything involved. These proposals are not only short sighted but selfish in nature.

Submitted via online port

March 2, 2026

Board of Fisheries
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, Alaska 99811

Re: SalmonState comments regarding Proposals 163, 164, 165 for the 2026 Statewide Finfish Board of Fisheries meeting

Dear Chair Carlson-Van-Dort and Board Members,

SalmonState urges the Board to pass Proposals 163-165, which would provide the ADF&G the tools to better manage trawl fisheries in state waters. In creating ADF&G, the Alaska State Legislature charged the department with the obligation to "manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state."[1] In turn, the Board of Fisheries was established "for the conservation and development of the fishery resources of the state."[2] ADF&G and the Board also have a public trust responsibility under the Alaska Constitution Article VIII Section 4, to maintain fish and wildlife under the "sustained yield principle." These Constitutionally mandated responsibilities require ADF&G and the Board to create e fishing and hunting regulations that protect fish resources for the benefit of Alaskans. Proposals 163, 164, and 165 provide ADF&G the tools to better fulfill these statutory and Constitutional obligations.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a salmon state by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

---

[1] AS 16.05.020(2)
[2] AS 16.05.221(a)

Alaska's fishing communities and Alaska Native people are suffering from adverse impacts of diminishing fish populations, climate change, and management inaction. Subsistence fishers, small boat (under 250ft) direct fishery participants, and sport fishers have lost access and opportunity to entire fishing seasons because of declining runs of Chinook and chum salmon, halibut, herring, and crab populations. However, these conservation actions are not equitably distributed across all Alaska fisheries. Currently, the trawl industry continues to bycatch fish species that other fisheries are prohibited from taking including Chinook and chum salmon, halibut, and snow crab. These trawls also continue to drag gear on the seafloor, impacting important benthic habitat.

Rising ocean temperatures are altering the marine ecosystem and changing fish species distribution and productivity, leading to a series of cascading impacts to the marine ecosystem and those who depend on its resources. To alleviate some of the strain on local fishing communities, SalmonState requests this Board approve Proposals 163, 164, and 165 to provide ADF&G accountability and enforceability in the state managed and parallel trawl fisheries.

Trawling is an indiscriminate method of fishing, which hauls huge nets through the water and often scraps the ocean floor. While fishing, these nets catch everything in their path, whether it's the target fish or not. There are extensive studies and research that show trawlers that drag the bottom of the ocean floor are highly destructive, contribute to climate change, and are, metaphorically, like clear cutting virgin forests.[3] In recent years, multiple countries highly dependent economically on commercial fishing such as the Chile,[4] Greece,[5] the United Kingdom,[6] and Sweden,[7] have banned or are phasing out bottom trawling in their waters to protect important habitat and species. Alaska and the United States cannot continue to turn a blind eye to the impacts trawling is having on our marine fish species and benthic habitat.

Alaskans, coastal and interior, are deeply concerned with the impacts of trawling on the marine ecosystem, non-target fish species, and Alaskan communities. According to a poll conducted by SalmonState regarding fishing issues facing Alaska, 74% of Alaskans support a ban on bottom

---

[3] *Bottom trawling releases as much carbon as air travel, landmark study finds,* The Guardian, March 17, 2021, https://www.theguardian.com/environment/2021/mar/17/trawling-for-fish-releases-as-much-carbon-as-air-travel-report-finds-climate-crisis

[4] Moniz, Rhonda, *Chile bans bottom trawling n vulnerable areas*, Marine Technology News, January 29, 2013, https://www.marinetechnologynews.com/blogs/chile-bans-bottom-trawling-in-vulnerable-areas-700331

[5] *Greece bans bottom trawling in all Marine Protected Areas*, Oceanographic, April 25, 2024, https://oceanographicmagazine.com/news/greece-bans-bottom-trawling-in-all-marine-protected-areas/

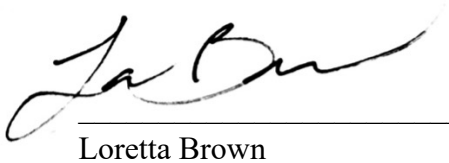
[6] *Total ban on sandeel fishing and partial ban on bottom trawling announced in the UK*, Oceanographic, January 31, 2024, https://oceanographicmagazine.com/news/ban-on-sandeel-fishing-announced-in-uk/

[7] Struna, Hugo, *Sweden bans bottom fishing in territorial waters,* Euractiv, June 4, 2024, https://www.euractiv.com/section/agriculture-food/news/sweden-to-ban-bottom-trawling-in-territorial-waters/

trawling in Alaska waters.[8] Polling done by the Data for Progress regarding a wide spectrum of political issues of concern for Alaskans in March 2025, also shows 74% of Alaskans support a ban on all trawling.[9]

SalmonState urges the Board to approve Proposals 163-165 and update the management of the trawl fisheries in a manner that provides clarity and transparency for the ADF&G and the public, as well as protecting important fish species and habitat from the destructive nature of trawl gear. Alaska's fish and wildlife resources and protection of their habitat is vital to the future prosperity of the state and its residents. Thank you for your time and consideration of these proposals. Please contact Loretta Brown at loretta@salmonstate.org with any questions regarding these comments.

Sincerely,



Loretta Brown
Legal and Policy Analyst
SalmonState

Sent via electronic mail:
Marit Carlson-Van-Dort, marit.carlson-vandort@alaska.gov
Gerad Godfrey, g.godfrey@alaska.gov
Mike Wood, mike.wood@alaska.gov
Tom Carpenter, tom.carpenter@alaska.gov
Greg Svendsen, greg.svendsen@alaska.gov
Curtis Chamberlain, curt.chamberlain@alaska.gov
Olivia Henaayee Irwin, oliviahenaayee.irwin@alaska.gov

[8] Bycatch survey results, 2025, https://salmonstate.org/bycatch-survey-results
[9] Data for Progress Survey, March 2025, Page 11, https://www.filesforprogress.org/datasets/2025/3/dfp_alaska_2025.pdf#view=fitH

PC420

Submitted by: Alex Sanarov
Community of Residence: Homer

I Oppose 186, it's out of cycle

it was opposed by the Department and most of the public input was against it

- there was no map of what area is intended to be closed
- there is no biological reason for this, there is no data
- there are over 1,200 silver streams in Upper Cook Inlet, the two they used as indicator streams in the Valley are the only two systems that did meet their silver count last year. And where are the #s coming from... with all this technology and still cant put counters up earlier to count the fish.

PC420

Submitted by: Alex Sanarov
Community of Residence: Homer

Proposal 186,I would 100% deny this Proposal because it does not meet Agenda Change Request emergency requirements, Opposed by ADF&G in Staff Comments on ACR 5, No conservation concern, about and it and where they keep finding these numbers.

Highly allocative.

Taken up out of cycle, just out of nowhere closing down area 1 and 2. Tell me where the coho #s are coming from, back in the days they had numbers on each species , and now with all this technology and still dont know how much cohos are going up the rivers and only know the kenai river, and kasilof river.... put a fish counter early as possible and you'll know exactly how much fishing are going up the rivers, not guessing #s, or putting a number out there and what is the catch limit. Start your counting in May and therez plenty of fish going up rivers

Back door votes occurring, between board members which is ridiculous.

Turned into a board generated proposal with no public input, with all that said everyone needs an input before shutting down fisheries with over excapmemt goals even higher what they need!!

PC421

Submitted by: Dennis Sanarov
Community of Residence: Homer

Proposal 186...

I Oppose the 186!!!! It does not meet the agenda change request emergency requirements. Turned into a board generated proposal with no public input, which is BS! Its Highly allocative

---

Submitted by: Jed Sapp
Community of Residence: Cordova, AK

My name is Jed Sapp. I was born and raised in Cordova and am a lifelong fisherman. I grew up fishing with my dad, and have spent 6 years running my own gillnet operation in Prince William Sound.

Proposal 170: I oppose proposal 170

Hatchery systems are far better managed through precision adjustments based on regional, biological data, research and development.

Proposal 171: I oppose proposal 171

Wild salmon naturally stray, but blunt cuts don't address root causes. Improved imprinting and release techniques offer much stronger outcomes.

Proposal 172: I oppose proposal 172

Hatchery systems are far better managed through precision adjustments based on regional biological data, research and development.

Proposal 187: I oppose proposal 187

No conservation or access concern exists here. This would close traditional fishing opportunities in favor of sport users that currently have no problem catching full limits.

For other proposals:

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

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

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

I support Proposal 175 – Dipnet mesh and configuration requirements:

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

Thank you,

Jed Sapp

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Albert Schmeil. I am a commercial salmon fisherman in Kodiak and operate two salmon seine vessels and a salmon tender.

With fewer returning fish, fishing days would be reduced and income would decline significantly. These proposals would directly affect Kodiak's economy and result in major losses in fishing opportunity in the region.

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

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

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

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

Sincerely,

Albert Schmeil
Kodiak, Alaska
[redacted]

PC424

Submitted by: Michael Schoessler
Community of Residence: Soldotna

The only reason trawl should be inside 3 miles from shore is to go to the harbor. Trawl devastates, through bycatch, many near-shore fish. Over the past four years the resident sport fishermen and charter fleet have seen cuts in rockfish retention. Fish and game blames it on the resident and charter fleet but, not the trawl bycatch. F&G gets recorded rockfish catches from the charter fleet but, not so much from the trawl fleet. My opinion is that trawl has no business in PWS either. Is AKF&G trying to decimate the fish populations?

Also, having multiple pink salmon hatcheries is ridiculous! Cut them back to two for four years and see if the chinook and chum rebound.

As for trawl, either get the Gulf of AK fleet 100% monitored or flat out ban them in State waters. It's terrible to see the damage trawl has caused, over the years.

PC425

Submitted by: Jon Schwartz
Community of Residence: Palmer

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

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Andrew Scudder, and I am a commercial salmon seine fisherman in Prince William Sound. I operate the F/V Gorbuscha. My family's livelihood and annual income are directly tied to the stability and predictability of salmon returns in this region. I participate in the common property fishery and operate as a small business owner whose revenue, crew employment, and annual planning depend on consistent harvest opportunities supported in part by Alaska hatchery production.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If hatchery production were significantly reduced, it would directly affect my income stability and my ability to plan and operate responsibly. Before each season, I commit to fuel purchases, gear upgrades, maintenance, insurance, and crew agreements. Those costs do not go down if production goes down. What changes is the level of risk I am carrying. Hatchery fish are not extra fish to me — they are part of what makes the season predictable enough to operate a business. They help smooth out the extreme highs and lows that come with wild stock variability. Removing that stability increases financial volatility and makes it harder to support my crew and my family. It also makes it harder to justify long-term investments in my vessel and permit.

In Prince William Sound, hatchery production is tied into the broader economic structure of the region. If production is reduced significantly, harvest opportunity drops. When harvest drops, processors see less throughput, crew members lose income, tenders haul fewer fish, fuel docks sell less fuel, and local marine businesses lose work. This fishery supports more than just permit holders. It supports deckhands, plant workers, transport companies, and coastal communities that depend on seasonal income. Reducing production would ripple through that entire system.

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

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

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

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

Sincerely,

Andrew Scudder
Idaho
[redacted]

PC427

Submitted by: Alex Senta
Community of Residence: Eagle river

Please adopt proposal 186. Any help the salmon can get to increase passage to the northern inlet freshwater locations will benefit all Alaskans. The stocks in these areas have dropped immensely in my lifetime. I grew up with plentiful numbers of salmon in little su, Deshka, Jim creek and others and something needs to be done in the salt water. Fresh water management cannot make enough difference when unsustainable harvest occurs in the inlet before they return to spawn.

PC428

Submitted by: Christopher Shelborne
Community of Residence: McGrath

Proposal11 Trawlers shouldn't be doing any dragging of the ocean floor. In fact they shouldn't be allowed to that close to Alaska's shores to begin with. If we fail to protect our offshore ecosystem then we fail to steward a viable and sustainable ocean environment for my children living here in Alaska. The damage done cannot be reversed. As a lifelong Alaska of four generations, I implore you not to keep going down this road. What a Hawaii allow a troller to drag over its underwater habitats? Good God, why are we even having to discuss this? Give back these greedy profiteers' blood money before it's too late.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Antonio Silva, and I am a commercial fisherman, floating processor, local business owner, personal use and subsistence user, sport fisherman, lifelong Alaskan, and resident of Wrangell, Alaska. I am the owner and operator of Silva Seafoods LLC and the F/V Danegeld.

I am writing to urge the Board to reject Proposals 170, 171, and 172. My business and my family's income rely heavily upon the hatcheries throughout Alaska, specifically in Southeast Alaska. Through the constant monitoring of Fish and Game biologists, we commercial fishermen harvest predominantly hatchery-raised wild salmon throughout the summer, which is a significant source of our family's income. The hatchery fish are also a significant source of our family's food throughout the year. I would not be able to operate my business without the hatcheries in Southeast Alaska, and I fear that due to rising operational costs, a reduction of this magnitude would cause them to scale back so tremendously that I would no longer be able to support my business and my lifestyle in Southeast Alaska.

Any reduction in hatchery production can and will cause catastrophic damage to the hatchery programs' production and operational costs, which will directly affect all of us — commercial fishermen, subsistence users, processors, and all communities in Southeast which support thousands of independent small businesses related to the harvest or consumption of local wild-caught salmon.

This would impact every business related to the catching, processing, and retailing of all salmon regionally, statewide, and nationwide. It would cripple Southeast Alaskan communities and destroy an already struggling fishing fleet, all without any Alaska-specific causal evidence.

The Marine Mammal Protection Act has allowed predatory mammal populations to flourish. These mammals are not managed through ADF&G and consume a significant amount of salmon while they are at the most critical point of their life cycle — heading upriver.

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

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

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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

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

Sincerely,

Antonio Silva
Wrangell, Alaska
[redacted]

[redacted]
[redacted]
Sitka, Alaska 99835
www.silverbayseafoods.com

March 2, 2026

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

via email: dfg.bof.comments@alaska.gov

Re: **Oppose Proposals 163-165**

Dear Chairwoman Carlson-Van Dort and Board Members:

Silver Bay Seafoods is a fishermen-owned seafood processing company with operations in Kodiak and False Pass, as well as plants across the State of Alaska. Thousands of Alaska residents rely on our company for direct employ or as independent fishermen operating all gear types. Consistent markets, employment, and availability of operations are critical to the benefits we bring to our partners and Alaska's communities. **Silver Bay Seafoods strongly opposes proposals 163, 164, and 165.**

These measures will not improve fisheries but only further restrict trawl fishing, directly threatening Alaska fishermen, residents, and coastal communities. The effects of these actions will extend beyond trawl operations, as fishermen and processors both rely on portfolios of fisheries to support their operations. Removing important fisheries from those portfolios (as the proposals are likely to do) will leave gaps in seasonal calendars reducing workforce size and operations in periods that other fishermen depend on. These overall reductions will have consequences for

communities and their residence who rely on the activity from fisheries to support their economies.

The proposed measures will require the development of technologies and regulatory monitoring systems not currently in existence imposing enormous costs on both Alaska Department of Fish and Game and the fishing industry. The consequence will be either fisheries discontinuing because of overly burdensome regulations or ineffective and unenforceable regulations. In either case, the costs will greatly outweigh any benefit.

Communities in the Western Gulf of Alaska and Central Gulf of Alaska rely heavily on trawl fisheries to support local fishermen. Kodiak has a strong local processing workforce with many residents who rely on year-round plant employment to maintain their residency. Undercutting the trawl fisheries – as these measures would do – would jeopardize their ability to remain in Alaska's coastal communities. We strongly urge the Board to reject these proposals due to the damage that they would impose on Alaska's fishermen, workers, and coastal communities.

Thank you for considering our comments.

Respectfully,

Abby Fredrick

Abby Fredrick

Vice President External Affairs

[redacted]
[redacted]
Sitka, Alaska 99835
www.silverbayseafoods.com

March 2, 2026

Alaska Board of Fisheries

Marit Carlson-Van Dort, Chair

via email: dfg.bof.comments@alaska.gov

RE: **Oppose** Proposals 170-172

Chair Carlson-Van Dort and Board Members:

Silver Bay Seafoods is a fishermen-owned seafood processing company partnered with fishermen participating in Southeast, South Central, and Kodiak, Alaska enhanced salmon fisheries. **We are aligned with fishermen, coastal communities, and ADF&G; we oppose proposals 170-172**.

We support Alaska's outstanding hatchery program, which is rooted in strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies that protect wild salmon populations. The hatchery program has demonstrated over 50 years of sustainable enhanced production to supplement our wild stocks, providing economic opportunity and food security to all users. A McDowell Group report identifies the economic contribution in 2018 of Alaska's salmon hatcheries to be 4,700 jobs, $218 million in labor income, and $600 million in total economic output. As a percentage of statewide harvest value, hatchery-derived salmon represents 22 percent of total salmon ex-vessel value over the study period. This percentage ranged from a high of 28 percent in 2013 to a low of 15

percent in 2016. Overall, hatcheries are a critical component of coastal fishing economy and any unwarranted reduction in opportunity could have a significant impact on the stability of these independent small businesses.

Hatchery production is managed through a rigorous public permitting process which involves many stakeholders and Alaska Department of Fish and Game (ADF&G) experts from multiple disciplines. Alaskans have rejected similar proposals during the regional plan team meetings and at the Southeast, Prince William Sound, and Kodiak board of fisheries meetings in recent years. Acting on these issues at a statewide meeting completely undermines the thousands of voices who support Alaska's hatchery program and the judgement and precaution exercised that has allowed the program to bring great benefits to Alaskans.

ADF&G opposes proposals 170-172 because it will permit only hatchery operations that minimize impacts on wild salmon stocks, and the commissioner will amend a permit if conservation concerns arise anytime a conservation concern arises. ADF&G staff comments also address the misinformation about Alaska's hatchery and wild salmon interactions and the misapplication of outside studies to our program stating: "Although there are a significant number of publications on interactions between hatchery production and wild stocks of salmon, very few are directly applicable to Alaska's salmon populations." Alaska's hatchery program was built to avoid issues that have arisen in other states and has been a success story for adaptive and sustainable fisheries management.

It must also be recognized that salmon enhancement under the hatchery can be an important tool for addressing wild king salmon conservation issues. In Southeast Alaska, several king salmon stocks were listed as stocks of concern between 2017 and 2021. This required strict conservation measures to be put in place for sport and commercial fisheries to protect those stocks. ADFG wisely targeted recreational fishing opportunities on hatchery king salmon in terminal harvest hatchery release areas, conserving wild stocks in nearby areas to meet escapement goals. By 2024, three of the stock of concern listings have been lifted, with wild king salmon stocks continuing to

meet escapement goals. In areas with stocks in decline, such as the Interior and South Central, hatcheries may be an important tool to consider to refocus effort in a way that aids in the recovery of depressed stocks. Proposals that limit Alaska's ability to use this tool to respond to stock status changes seem unwise and unnecessary. The proposals at issue undermine Alaska's longstanding trust in its ADF&G Commissioner and staff, who allow only hatchery programs that support sustainable fisheries and yield benefits for Alaskans.

Alaska's hatcheries are well managed under the ADF&G Commissioner's authority, they provide significant economic opportunities, and are one of the few tools available for providing opportunity while we address low salmon production. **Please take no action on proposals 170-172**.

Thank you for considering our comments.

Respectfully,

Abby Fredrick

Abby Fredrick

Vice President External Affairs

[redacted]
SITKA, ALASKA 99835
MAIN: [redacted]
FAX:
SITKATRIBE.ORG

February 5, 2026

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

RE: Comments for 2026 Statewide Finfish Meeting

Members of the Board of Fisheries,

I write on behalf of the Sitka Tribe of Alaska (STA), a tribal government in Sitka, Alaska, with over 4,881 tribal citizens. As a tribal government, STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens. STA submits the following comments on statewide proposals 176, 177, 179, and 180.

Proposals 176 and 177

STA **opposes** proposals 176 and 177. Charter operators currently harvest the majority (ADFG 2025) of sport king salmon allocation within the waters of Southeast Alaska. STA expresses concern that allowing saltwater charter vessels to pool bag and possession limits will likely increase non-resident harvest of king salmon, resulting in additional time and area closures and reducing the availability of king salmon for Tribal Citizens and Alaska residents.

Proposal 177 does not address how pooled bag and possession interact with annual limits. Additionally, neither proposal addresses the complications that combining limits that arise with groups containing a mix of Alaska residents and non-residents.

Proposals 179 and 180

STA **opposes** the establishment of a yearly bag and possession limit for king salmon for Alaska residents. It is unclear how the limits suggested in each proposal were determined and how they may change as king salmon productivity changes over time. Additionally, resident anglers currently make up the minority of king salmon harvest in Southeast Alaska. Establishing an annual limit would add additional burden to resident anglers and reduce their ability to provide fish for themselves and family. Lastly, establishing an annual limit would conflict with the Southeast

[redacted]
SITKA, ALASKA 99835
MAIN: [redacted]
FAX:
SITKATRIBE.ORG

Alaska King Salmon Management Plan 5 AAC 47.055, limiting harvest for resident anglers regardless of king salmon abundance.

Please contact Jeff Feldpausch, Resource Protection Department Director, at [redacted] or email [redacted] with any questions. Thank you for your thoughtful consideration.

Sincerely,

Yeidikook'áa (Dionne) Brady-Howard
Tribal Council Chairwoman

Tydingco, T. Pawluk, J. Tugaw, A. Rice, J. 2024. Overview of the Sport Fisheries for King Salmon in Southeast Alaska through 2024: A Report to the Alaska Board of Fisheries. Special Publication No. 24-19

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is John Skeele, and I am a commercial fisherman based in Sitka, Alaska. I operate the F/V Sunfish.

I am writing to urge the Board to reject Proposals 170, 171, and 172. I have trolled and gillnetted in Southeast Alaska for a number of years, and I will restrict my comments to the hatcheries in this region — in my case, NSRAA and DIPAC. I feel that both gear groups have benefited greatly because of our revolutionary, fisherman-funded hatchery programs. Regions that produced varying and often low-volume catches have changed into major economic drivers for the adjacent communities. New release sites and egg takes are already highly regulated by the Alaska Department of Fish and Game. I think arbitrary limits on hatchery expansion would be an unnecessary impediment to the efficiency of the programs themselves.

Smaller runs would directly affect my income. Reduced harvest would adversely affect the whole chain — everyone who touches a fish and makes some income from those actions. A reduction in harvest would have serious repercussions, especially at a time of historically low ex-vessel prices.

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

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

Sincerely,

John Skeele
Sitka, Alaska
[redacted]

Submitted by: Dustin Slinker
Community of Residence: Anchorage

Proposal 186

Many local anglers have spent years fishing the Matanuska–Susitna Valley drainage of the Northern Cook Inlet, targeting wild Chinook and Coho salmon. Unfortunately, wild salmon populations continue to struggle as they return to the Northern Cook Inlet drainages.

We strongly urge the Board to support Proposal 186 and take action to help restore wild salmon stocks to the Northern Cook Inlet. The coho escapement goals over the past three seasons should be cause for serious concern.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Kristen Smith, and I make my living with hatchery fish in Prince William Sound, Alaska, as I have since 2007. I have held multiple positions as a fisherman, tenderman, and processor.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would ruin my livelihood. I hire 20 local Alaskans every year, and these fish are vital to that effort. Making decisions that are not based in science affects our way of life unnecessarily.

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

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

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

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

Sincerely,

Kristen Smith
Prince William Sound, Alaska
[redacted]

Submitted by: Tanner Smith
Community of Residence: Wrangell Alaska

To: Chairman Carlson-Van Dort and Board Members

Thank you for this opportunity to comment and for making the time to listen.

This letter is to ask you to take a closer look at Proposals 163, 164, 165 in the case of Beam trawling for shrimp.

There is a small group of beam trawl fishermen in mostly in Southeast Alaska that trawl for both Pink and Sidestripe Shrimp (I am one of these fishermen). There are some very important differences between the factory trawlers that I assume these proposals are intended for, and the small "Mom and Pop" beam trawl boats that trawl exclusively for shrimp. Unfortunately, we are both found in the same gear group, and thus this letter.

Proposal 11: This doesn't affect shrimp beam trawlers, so I will refrain from commenting on this.

Proposal 163 and 164: Shrimp beam trawling makes contact with the ocean floor. While one might jump to the conclusion that this is bad, I would like to point out a few things:

1. This fishery is over 100 years old, and the same shrimp trawl drags have been used for decades. We trawl on sandy bottom, usually in close proximity to a river. If a fishery has been successful for this long, in the same exact areas, you might consider it as... sustainable?

2. I have read a few things that once a factory trawler trawls over the ocean floor it can takes years for it to recover its abundance. Shrimp trawling is NOT like this. I can often fish the exact same area/ drag within 2-3 days. And amazingly, shrimp seem to congregate in more abundance on places that are frequently trawled on, verses places rarely fished.

3. Shrimp beam trawlers travel at very low speeds (1.1 to 1.5 knots) compared to factory trawlers that can travel up to 5 knots while fishing. Because of this low speed, the small size of our trawls (less than 60 ft) we NEVER catch salmon, and very rarely catch halibut.

4. Shrimp beam trawls are equipped with fish excluders that keep fish and crab out of the trawl bag. On the rare occasion that a halibut or crab makes it over the fish excluder, it is always alive and returned to the ocean immediately to insure its survival.

I personally have 2C halibut quota, that I have invested virtually years of my life acquiring. I also gillnet for salmon. While I don't crab, I have a lot of friends that do crab. I'm pointing this out to ensure you that I get VERY upset when I read about how much bycatch factory trawlers have, but i can also positively say that shrimp beam trawlers are NOT the problem here.

Proposal 165 is not relevant to shrimp beam trawlers. Although we do have fish excluders we never have salmon bycatch.

Just some thoughts here. Just the talk of closing down the trawl fishery in the state of Alaska this last year and a half has already had tremendous impact on my shrimp beam trawl fishery and my personal life. The limited entry permit I paid for is essentially worthless. No one is going to buy it even if I wanted to sell it. I have probably a $150,000 of shrimp trawl gear that is only worth something to me because no one will invest in an "unstable" fishery. There are improvements I want to keep making to my boat and gear that I am holding back on because I honestly don't know if this fishery will be around in a couple of years. I constantly have to fight against the stigma that goes with self marketing a product that is "trawl caught", because of its association with a group of fishing boats that fish for different products, with unsustainable methods, that are a thousand miles away from me. My hope is that you will separate shrimp beam trawlers from the factory trawlers, especially the Amendment 80 fleet (which is the real problem), with rules that make sense for each unique fishery.

Thank you for your consideration

Tanner Smith, FV Netted Dreams

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Thomas Smith, and I am an 18-year-old studying aquaculture and mariculture in Sitka, Alaska. My family has been fishing in Alaska since time immemorial, with our most recent memory being my great-grandfather who fished Bristol Bay by sail. I started working with salmon before I could walk and pulled in a five-pound fish when I was four. I started working in hatcheries last year at 17. These fish hold immense weight for us Alaskans and provide substantial income for the state. The hatchery system has eased pressure on wild stocks while simultaneously providing the needed fish to sustain fisheries since the founding of Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These reductions would shrivel industries that rely on these fish to feed their families. Not only that, but these reductions can easily put major pressure on sustained wild stocks, hurting not only the fishermen but the subsistence users who have been here for millennia. That is not the right thing to do.

Sitka especially is a very large fishing town in terms of Alaska, supported by four hatcheries on Baranof Island. With cuts to hatchery limits, we will see the decimation of local salmon populations, wild or not.

I personally think focusing on hatcheries diverts attention away from other causes we cannot even see right now. We are still doing research on the marine life of salmon and the complex systems they have developed. We also need to look at the industrial fisheries that destroy migratory patterns and their bycatch. There is so much more research that needs to be done before we can even look toward hatcheries as an issue.

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

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

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

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is William Smoker. I am a Fisheries Scientist and Professor Emeritus at the University of Alaska, a community member, and a sport fisherman.

These proposals would result in reduced fishing opportunity and diminished economic opportunity. They would mean loss of jobs, loss of income, and loss of economic opportunity.

They would also increase harvest pressure on wild stocks, as currently harvest is diverted to hatchery stocks in-season by harvest managers. Absent hatchery opportunity, harvesters will increase pressure on wild stocks.

State policy, following law, provides a process based on biological knowledge through the Regional Planning Process for setting limits on hatchery production. There is no basis for short-circuiting this process, which has been successful in maintaining sustainable wild runs for decades and enhancing economic opportunity in Alaska.

Hatcheries provide demonstrable fishing opportunities for the Alaska industry, sport, and subsistence harvesters. Disinterested third parties have, after rigorous review, certified Alaska salmon harvests as sustainable. These reviewers have taken long, hard looks at the effects of hatcheries.

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

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

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

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

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

Sincerely,

William Smoker
Alaska
[redacted]

Submitted by: Charles Snyder
Community of Residence: Anchorage, AK

Trawl runs “science” based information to regulate bycatch and allowable quotas for harvesting. Science is a basic fundamental of trial and error. While technology today is far more advanced than 50-60 years ago, trawl has been running our oceans rampart for that long. Trawl needs completely abolished, not only three miles from land and bottom trawlers but all trawling and outside the state jurisdiction. If their science truly is correct then our rivers will continue at its current state. If they are wrong then our fresh water resources will replenish. It needs at least 8 years stopped, Mid water and bottom, for this will be one solid king salmon cycle to the fullest capacity. Trial and error.

PC439

Southeast Alaska Fishermen's Alliance

[redacted]
Juneau, AK 99801

Email: [redacted]

Cell Phone: [redacted]

Fax: [redacted] Website: http://www.seafa.org

February 26, 2026

Marit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811

RE: Statewide Board of Fish Proposal Comments

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

Southeast Alaska Fishermen's Alliance (SEAFA) a multi-gear/multi-species small boat association representing our 300+ members involved mainly in the salmon, crab, shrimp and longline fisheries of Southeast Alaska. We have an approximately 80%+ Alaskan residency. In the salmon division we have members involved in the gillnet, troll and seine salmon fisheries, and some Prince William Sound salmon drift gillnet fishery. The longline division represents SE longline (and pot) fisheries as well as halibut and sablefish quota share fisheries. Most of our membership also participates in personal use, subsistence and sport fisheries as well as taking home fishery resources from their commercial harvest which is documented on fish tickets.

Proposal #170: OPPOSE – SEAFA opposes proposal #170 to reduce the permitted egg take of each hatchery permit for pink and chum salmon by 25% of the current permitted capacity. Similar proposals have been introduced for each meeting for several cycles and have all been voted down. SEAFA agrees with RC 2 Staff Comments regarding the Dept of Law Memo on Authority of the Board of Fisheries Over Private Non-Profit Hatchery Production[1] .

Reducing the chums and pinks by 25% would have a very negative affect on the economic stability of the hatchery association, the fishermen, processors and local communities. A change in the status quo would have grave economic impacts on the

[1] https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2019-2020/hc/law.pdf

hatchery association and would in many cases by the equivalent of revoking a permit which is clearly not allowed as per discussion on the Dept of Law Memo.

The reasoning for this action is to minimize the harmful effects of the enhancement of chums and pinks but does not and has not over all the years showed any direct correlation between the Alaska hatchery permitting processes and policies and the studies of hatchery effects from a completely different permitting process. The studies done in Alaska that do focus on wild/hatchery interactions infer negative interaction at sea. The Commissioner of Fish and Game has adjusted hatchery permits when there was a compelling reason based on data that indicates the amendment to the permit would have a reasonable probability of reducing the identified adverse effects on wild salmon.

Southeast Alaska has an allocation plan in place that would be severely disrupted by arbitrarily reducing hatchery pink and chum release by 25%. Many of the SE Hatchery programs were established/developed through funding as a way to minimize impacts from the Pacific Salmon Treaty negotiations. Without the chum salmon programs the coho and chinook programs could not survive.

Reducing the pink and chum program by 25% puts the hatcheries in an economic bind that in turn creates likely defaulted payments to the State of Alaska, Division of Investments.

The framework for revising or developing a hatchery return is public and open but conducted through the Regional Planning Teams with the final decision in the hands of the Commissioner of ADF&G. This was developed that way by the Alaska State Legislature and did not provide the authority for the Board of Fish to issue, revoke or substantially change the conditions of the permit. The authority of the Board of Fish is in regulating “indirect authority over hatchery production by regulating harvest of hatchery release fish in the common use fishery,” by regulating “hatchery broodstock and cost recovery harvests,” and be regulatory action “amending those portions of hatchery permits relating to the source and number of salmon eggs (taken from the wild) hatchery harvests, and designation of special harvest areas.

Alaska’s salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations. Please oppose proposal #170.

Proposal #171 & 172: OPPOSE – SEAFA opposes proposal #171 and #172 which are variations of the previous proposal. See RC2 Staff Comments and our comments above for our reasoning to oppose these proposals.

Proposal #169: SUPPORT – SEAFA supports having a clear definition of slinky pots.

Proposal #176, 177 & 178: OPPOSE – SEAFA opposes the concept of pooling bag and possession limits of sport caught fish particularly sport fish charter vessels. Pooling bag and possession limits basically provides a loophole for taking more sport fish by providing an opportunity to take additional individual out on the vessel that have no desire to fish so that you can have a greater possession limit. Daily bag and possession limits are a management measure used to control harvest, by allowing pooling of sport fish it would likely lead to an increase in harvest and more restrictive management measures in the future.

Proposal #181: SUPPORT – SEAFA supports proposal #181 submitted by ADF&G that aligns regulatory and statutory language for sport fishing gear. Clear and consistent regulatory language helps reduce confusion.

Proposals #182: OPPOSE – SEAFA opposes bow hunting for sport fishing without a bag or possession limit. First no new gear type for a fishery should be allowed to exist as unlimited when the other gear types have bag and possession limits. Second, bow hunting has the very big potential to cause harm to fish such as salmon as they are reaching their spawning grounds with missed strikes and harm to the habitat with potential debris from broken gear.

Proposal #183: SUPPORT – SEAFA supports maintaining finfish in a manner that allows for determination of size and species until being processed or prepared for human consumption or is an exempt species for use as bait.

Thank you for the opportunity to comment on the Statewide Board of Fish proposals. Please feel free to contact the office if you have any questions regarding our comments on these proposals.

Proposal #187: OPPOSE – SEAFA opposes closing the Tsiu River and all waters within one quarter mile of the Tsiu River and Kaliakh River confluence to commercial fishing for salmon. This is a geographical area that is very dynamic and changes sometimes as often as year to year. ADF&G has the ability to adjust fishing line as appropriate when the rivers change by EO authority which they use. The area does not have any conservation concerns and therefore should not be closed to commercial fishing. This proposal was submitted as an Agenda Change Request (ACR) and in the staff comments for the work session, the Dept did not feel this proposal met the requirements for acceptance of an ACR. This is an allocative proposal which is not appropriate to bring up in an out of cycle meeting and why the Dept is neutral on their comments.

Sincerely,

Kathy Hansen
Executive Director

SEAGO
SouthEast Alaska Guides Organization

March 2, 2026
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526
Email adfg.bof.comments@alaska.gov

RE: Comments by SEAGO for Statewide Finfish and Supplemental Issues meeting

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

SEAGO serves as the voice of Southeast Alaska sport fishing operations and their supporters, representing the industry on all vital issues. Our mission is to promote Alaska's tradition of sport fishing through regulations that protect the sustainability of our fish resources, coastal communities, and businesses.

Guided sport fishing in Southeast Alaska supports 1,750 jobs, generates $65 million in labor income, and drives $271 million in total spending across approximately 176,000 angler days annually in the region. These impacts extend across Southeast Alaska's working waterfronts and coastal communities, supporting small businesses, air carriers, processors, fuel docks, lodges, and transportation providers throughout the region.

Our region depends on healthy fish stocks and stable, science-based management. Conservation and regulatory clarity are foundational to sustaining both the resource and our communities that rely on it. SEAGO has evaluated statewide proposals through this lens.

SEAGO Supports Proposal 176.

Vessel-level pooling within a clearly defined aggregate limit has the potential to reduce regulatory discard and associated release mortality. Under individual limits, anglers are required to release legally harvested fish once a personal bag limit is reached, even when other anglers on the same vessel have remaining harvest opportunity. These releases can result in avoidable mortality due to handling stress, barotrauma, and post-release mortality.

Allowing retention within a fixed vessel-level cap maintains existing overall harvest ceilings while reducing releases required solely for regulatory compliance.

When implemented with clear and enforceable vessel-level caps, pooling can reduce cumulative release mortality while preserving biological accountability.

SEAGO respectfully withdraws Proposal 177 in support of Proposal 176.

Proposal 176 provides a more complete regulatory framework for vessel-level pooling, including defined limits and guardrails that maintain individual seasonal limits and overall harvest ceilings.

SEAGO opposes Proposal 181 as written

SEAGO requests that Proposal 181 be clarified to ensure that downriggers and power-assisted reels remain clearly authorized under 5 AAC 75.020.

Subsection (d) of current regulation explicitly allows power-assisted fishing reels subject to mounting and weight requirements. Proposal 181 does not appear to amend that subsection, and SEAGO supports retaining this language without alteration.

The proposal references questions regarding gear attached to drones, radio-controlled devices, or downriggers. As drafted, the language could create unintended ambiguity regarding the continued lawful use of downriggers, which have long been part of Alaska's sport fishing practice.

To avoid uncertainty in interpretation or enforcement, SEAGO requests that final regulatory language should explicitly preserve the lawful use of downriggers as part of a closely attended sport fishing line.

SEAGO opposes Proposal 170.

This proposal would impose a uniform 25 percent reduction in permitted egg take levels for pink and chum salmon hatchery programs statewide. This proposal applies a blanket reduction without Alaska-specific findings demonstrating that such action is biologically necessary across regions or facilities.

In Southeast Alaska, chum production provides the financial foundation of the hatchery system. Revenue generated from those returns supports ongoing operations, including the more costly production of Chinook salmon. Hatcheries in the region annually release approximately 10 million Chinook salmon, including roughly 2.5 million designated to support sport fisheries. Hatchery-origin Chinook account for up to 50 percent of the harvest near Juneau and approximately 30 percent near Ketchikan.

Reducing chum egg take could directly affect the revenue that sustains Chinook production, potentially diminishing harvest opportunity and increasing pressure on wild stocks without a demonstrated biological trigger tied to current Alaska data. SEAGO supports continued evaluation of hatchery-wild interactions through structured, Alaska-specific scientific review.

SEAGO remains committed to conservation-driven, science-based fisheries management. The long-term health of Alaska's fish stocks is foundational to the stability of our coastal communities and working waterfronts. We appreciate the Board's thoughtful consideration of these proposals and stand ready to continue constructive engagement in support of responsible stewardship.

Respectfully,

Kim Landeen
Finfish & Statewide Director
Southeast Alaska Guides Organization

Forrest Braden
Groundfish & Federal Director
Southeast Alaska Guides Organization

PC441

Submitted by: Philip Doherty
Southeast Alaska Seiners Association (SEAS)
Community of Residence: Ketchikan

March 17–21, 2026

Statewide Finfish and Supplemental Issues

Proposals 171 and 172 - Oppose

The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to Proposals 171 and 172.

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve a fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery and a robust and healthy hatchery program that is designed to minimize wild stock interactions and enhance fisheries.

PC441

Submitted by: Philip Doherty
Southeast Alaska Seiners Association (SEAS)
Community of Residence: Ketchikan

The Southeast Alaska Seiners Association (SEAS) would like to express our opposition to Proposal 170 which would reduce SE AK hatchery production by 25%.

SEAS is a commercial fishing advocacy group made up of people who support and participate in the salmon fishery in southeast Alaska using purse seine gear. SEAS was formed in Ketchikan in 1968 by fishermen. Its goal is to help preserve a fishery that has been happening in southeast Alaska since the early 1900's. Southeast Alaska has a healthy, well-managed wild stock fishery and a robust and healthy hatchery program that is designed to minimize wild stock interactions and enhance fisheries.

- The Private Non-profit hatchery programs are stakeholder driven and overseen by fishermen who strongly support Alaska's mandate to protect wild stocks.
- In SE AK, hatchery genetic policies prioritize using local broodstock to maintain genetic diversity within wild salmon populations, meaning hatcheries primarily collect eggs from fish originating in nearby streams to minimize genetic impacts on wild stocks when hatchery fish stray back to spawn; this is done to protect the integrity of wild populations and is a key component of the Alaska Department of Fish and Game's (ADF&G) broader genetic policy for salmon hatcheries.
- The highest priority of the Alaska hatchery programs is to protect and maintain wild stocks. All common property fisheries in SE AK are targeted on wild stocks. Hatchery produced salmon are caught incidentally during those common property fisheries. The only targeted fisheries for hatchery salmon are conducted in the Terminal Harvest Area.
- In SE AK there is an allocation plan in place for the distribution of hatchery fish (5AAC 33.364). The troll fishery is below their allocation, the gillnet fishery is above their allocation, and the seine fishery is within their allocation. The allocation regulation is based on historical hatchery production. If there are significant changes to hatchery production the Board of Fish will have to re-exam the allocation plan.

- Colonization (or straying) is a natural part of the salmon life cycle, so hatcheries are required to use locally adapted stocks from nearby rivers and streams to maintain the natural genetic mixing of salmon populations within an area.
- There is some "straying" in wild stock salmon. Is the rate of "straying" in hatchery produced salmon any different than in wild stocks?
- Reduction of hatchery produced salmon would put extra pressure on wild stocks. ADF&G salmon managers would have to deal with more boats fishing in common property fisheries as those boats may not have the options of fishing in Terminal Harvest Areas during common property fisheries.
- Alaska's salmon hatchery program employs strong scientific methodology and is built upon precautionary principles and sustainable fisheries policies to protect wild salmon populations.
- Reducing hatchery production by 25% would have negative economic consequences for all user groups, processors, and communities in SE AK. This reduction would result in lost jobs, decreased tax revenues, and reduced income for commercial fishermen, processors, and local businesses. It would also impact numerous SE AK charter operations and lodges.
- Cutting production of pink and chum salmon would significantly reduce these revenue streams making it difficult, if not impossible, to meet State of Alaska Fisheries Enhancement Revolving Loan Program repayment obligations.
- Reduced production would be a financial burden on hatchery operation. Hatcheries may be forced to eliminate more expensive programs that produce chinook, coho, and sockeye salmon.
- There is no evidence that these significant reductions will do anything to address unknown wild salmon interaction concerns addressed by the proposer of 170.
- The Southeast Alaska Chinook Salmon Fishery Mitigation Program was initially established in 2009 as part of the Pacific Salmon Treaty negotiations and was designed to alleviate economic impacts resulting from a 15% reduction in Chinook salmon harvest levels under the 2009 revision to the Treaty. This program continues to be necessary due to an additional 7.5% reduction in Chinook harvest levels under the 2019 revision of the Treaty.

Sincerely,

Phil Doherty

Executive Director – SEAS

[redacted]

Ketchikan, AK 99901

Southeast Alaska Opposition to chum salmon hatchery production reduction by 25%

<u>For Reference - in Opposition to Proposal 170</u>

Submitted by Southeast Alaska Hatchery Operators – DIPAC, NSRAA & SSRAA

Proposal 156, a proposal nearly identical to Proposal 170, was put forward in the winter of 2025 at the Southeast Alaska Board of Fisheries meeting in Ketchikan. This proposal was specific to Southeast Alaska and was strongly opposed, as listed below.

Because proposal 170 is a Statewide proposal, the people of Southeast Alaska are less likely to weigh in for comments. Proposal 170 goes beyond individuals and groups' regional understanding of their "neighborhood" hatchery programs.

As of February 4, 2025, a total of 264 comments were submitted in opposition to Proposal 156. Of these, 195 came from individuals, while 69 were from organizations, including cities, chambers of commerce, economic development councils, tribal entities, the sport/charter industry, the commercial fishing industry, and nearly all Southeast Advisory Committees, except for one, which narrowly voted in favor. Please review the opposition letters from the Southeast Alaska Board of Fish meetings last spring to better understand the sentiment behind these thousands of individuals represented.

Note: Two comments (PC 529 and PC 156) were mistakenly classified as support but should be recorded as opposition.

Cities-11

1. City and Borough of Juneau (PC89)
2. City and Borough of Sitka (PC90)
3. City and Borough of Wrangell (PC91)
4. City of Craig (PC92)
5. City of Kake (PC93)
6. City of Ketchikan (PC94)
7. Haines Borough (PC199)
8. Ketchikan Gateway Borough (PC248)
9. Petersburg Borough Assembly (PC391)
10. Haines Borough Assembly (RC 011)
11. City of Hoonah (RC 088)

Tribes – 7

1. Central Council of the Tlingit & Haida Indian Tribes of Alaska (PC77)
2. Chilkoot Indian Association (PC82)
3. Huna Totem Corporation (PC225)
4. Ketchikan Indian Community (KIC) (PC249)
5. Metlakatla Indian Association (PC337)
6. Skagway Traditional Council (PC461)
7. Organized Village of Kasaan (RC 087)

Submitted by Southeast Alaska PNP Operators

Charter/Sport Industry- 9

1. Alaska Charter Association (PC3)
2. Alaska Fly Fishing Goods (PC4)
3. Alaska Reel Adventures (PC10)
4. Angling Unlimited (PC18)
5. Bear Paw Charters LLC (PC35)
6. Eagle Charters, Haley Janttie (PC146)
7. El Capitan Lodge (PC152)
8. Southeast Alaska Guides Organization (SEAGO) (PC469)
9. Territorial Sportsmen Inc (PC499)

Fish and Game Advisory Committees - 11

1. East Prince of Wales Island AC (AC2)
2. Elfin Cove AC (AC3)
3. Icy Straits AC (AC5)
4. Juneau-Douglas AC (AC6)
5. Ketchikan AC (AC7)
6. Klawock AC (AC8)
7. Pelican AC (AC9)
8. Petersburg AC (AC10)
9. Prince William Sound/Valdez AC (AC11)
10. Sitka AC (AC12)
11. Wrangell AC (AC14)

Chambers - 5

1. Southeast Conference (PC472)
2. Greater Juneau Chamber of Commerce (PC191)
3. Prince of Wales Chamber of Commerce (PC399)
4. Greater Ketchikan Chamber of Commerce (PC192)
5. Wrangell Chamber of Commerce (PC555)

Economic Development/Other - 4

1. Ashburn & Mason, P.C. (PC22)
2. Juneau Economic Development Council (JEDC) (PC239)
3. Sitka Economic Development Council (PC458)
4. True North Industries LLC (PC517)

Commercial Fishing Industry - 14

1. Alaska Longline Fishermen's Association (PC6)
2. Alaska Trollers Association (PC11)
3. Canfisco Group USA (PC71)
4. EC Phillips & Son Inc. (PC148)
5. OBI Seafoods (PC372)
6. Pacific Seafood Processors Association (PC382)
7. Petersburg Vessel Owners Association (PC392)
8. Phillips Fisheries LLC(PC396)
9. Purse Seine Vessel Owners Association (PC404)
10. Southeast Alaska Fishermen's Alliance (SEAFA) (PC468)

Submitted by Southeast Alaska PNP Operators

11. Trident Seafoods (PC516)
12. United Fishermen of Alaska (PC522)
13. Yakobi Fisheries (PC558)
14. Seafood Producers Coop (RC 086)

PNP Hatchery Operators – 8 letters (7 operators):

1. Alaska PNP Hatchery Operators (PC9)
2. Armstrong-Keta, Inc. (PC20)
3. Douglas Island Pink and Chum (DIPAC) (PC141)
4. Kodiak Regional Aquaculture Association (PC266)
5. Northern Southeast Regional Aquaculture Association (NSRAA) (PC371)
6. Prince William Sound Aquaculture Corporation (PC401)
7. Southern Southeast Regional Aquaculture Association (SSRAA) (PC473)
8. Valdez Fisheries Development Association Inc (PC525)

Submitted by Southeast Alaska PNP Operators

[redacted] ite 201
Juneau, AK 99801
Phone [redacted]
www.seconference.org
Email [redacted]
SOUTHEAST ALASKA REGIONAL DEVELOPMENT ORGANIZATION

March 2, 2026

Alaska Board of Fisheries
Art Nelson, Executive Director
PO Box 115526 Juneau, AK 99811

Re: Opposition for Proposal 170

Dear Art Nelson and the Board of Fisheries:

This letter is to express opposition from Southeast Conference for Proposal 170 to be considered at the March 17-21, 2026 Alaska Board of Fisheries meeting, which would reduce hatchery production of pink and chum salmon by 25%, posing a significant risk to the hatchery supported ecosystem in Southeast.

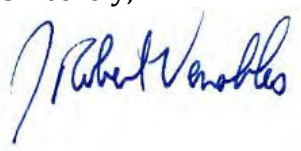
Southeast Conference is the state and federally recognized regional Economic Development District for Southeast Alaska. Southeast Conference has 240 member organizations representing people and businesses from all 35 regional communities. Our mission is to support activities that promote "strong economies, sustainable communities, and a healthy environment in Southeast Alaska" in the region. The 2030 Southeast Comprehensive Economic Development Strategy (CEDS) identifies two priority objectives and six additional seafood and maritime initiatives that are supported by the region's hatchery programs. The region and membership have demonstrated strong support for hatcheries as an essential component to a healthy fish stock supporting the regional seafood economy.

The health of fisheries, including hatcheries, is critical to Southeast Alaska and the state. Alaska's salmon hatchery program is responsible for supporting approximately 4,200 jobs, $219 million in labor income, and $576 million in economic output annually benefiting over 14,000 Alaskans who earn part of their livelihood from hatchery salmon. In addition to negative ramifications for the commercial sector, a reduction in hatchery production would diminish the availability of salmon for subsistence, personal use, and sports fishing impacting food security, cultural practices, and recreational opportunities in Southeast Alaska and beyond. Southeast Conference recognizes the role Southern Southeast Regional Aquaculture Association (SSRAA), Douglas Island Pink and Chum, Inc. (DIPAC), and Northern Southeast Regional Aquaculture Association (NSRAA) play in generating economic stability, providing jobs, and supporting local communities through hatchery operations.

Proposal 170 would create uncertainty for hatchery programs, complicating long-term planning and financial commitments potentially jeopardizing the entire program. Current data on hatchery impact on wild salmon populations remains inconclusive and does not substantiate the drastic cuts laid out in Proposal 170. Alaska's hatchery system follows stringent public permitting and scientific standards to ensure that wild salmon populations are protected while benefiting all user groups.

A strong hatchery program is critical to the seafood industry and the economic well-being of the communities in Southeast Alaska and across the state. Southeast Conference strongly opposes Proposal 170 scheduled for consideration at the March 17-21, 2026, Board of Fisheries meeting and urges the Board of Fisheries to reject this proposal to prevent detrimental economic and social impacts on Alaska's hatchery programs and the communities they support. The Southeast Conference calls upon the Alaska Board of Fisheries to commit to science-based, objective assessments for hatchery management, working in collaboration with the Alaska Department of Fish and Game, industry leaders, and the hatchery community to ensure that management decisions reflect the value and benefits Alaska's hatchery programs bring to all residents.

Sincerely,



Robert Venables
Executive Director
Southeast Conference

ARDOR

Southern Southeast Regional Aquaculture Association, Inc.
[redacted], Ketchikan, Alaska 99901
[redacted] www.ssraa.org

March 2, 2026

Alaska Dept. of Fish and Game
Alaska Board of Fisheries
Submitted via online form

Chair Carlson-Van Dort and Members of the Alaska Board of Fisheries,

RE: Opposition to Proposals 170, 171, 172

Thank you for the opportunity to comment on the proposals before you at the Statewide Finfish and Shellfish meeting in Anchorage. The Southern Southeast Regional Aquaculture Association (SSRAA) is a regional nonprofit salmon hatchery organization originally incorporated in 1976. SSRAA is governed by a 21-member Board of Directors representing a cross-section of regional salmon users, communities, and members of the public. Our mission is to *"enhance and rehabilitate salmon production in Southern Southeast Alaska to the optimum social and economic benefit of salmon users."*

In 2019, an agreement was made between Alaska's hatchery operators and the ADF&G Commissioner to keep permitted egg capacity for chum and pink salmon at their currently permitted levels. Since that agreement, **there have been no new release sites permitted, nor have any increases in chum or pink salmon permitted capacity been requested.**

SSRAA releases approximately 200 million chum salmon, 3 million Chinook salmon, and 9 million coho salmon annually across 12 release sites in southern Southeast (SSE) Alaska. SSRAA is currently at 86% of our permitted chum salmon capacity and **does not have the ability to release more salmon due to a lack of rearing space and water.** SSRAA currently releases chum salmon from six locations across SSE Alaska. These sites were deliberately selected to minimize potential interactions with wild salmon stocks and are situated well away from the region's wild chum salmon escapement index streams monitored by ADF&G to assess wild stock abundance (Figure 1). SSRAA's founding members strategically selected these sites to significantly contribute to the common property fishery while ensuring minimal impact on wild stocks. Notably, SSE Alaska summer-run chum salmon index streams have only missed the lower bound of their escapement range four times since 1990.

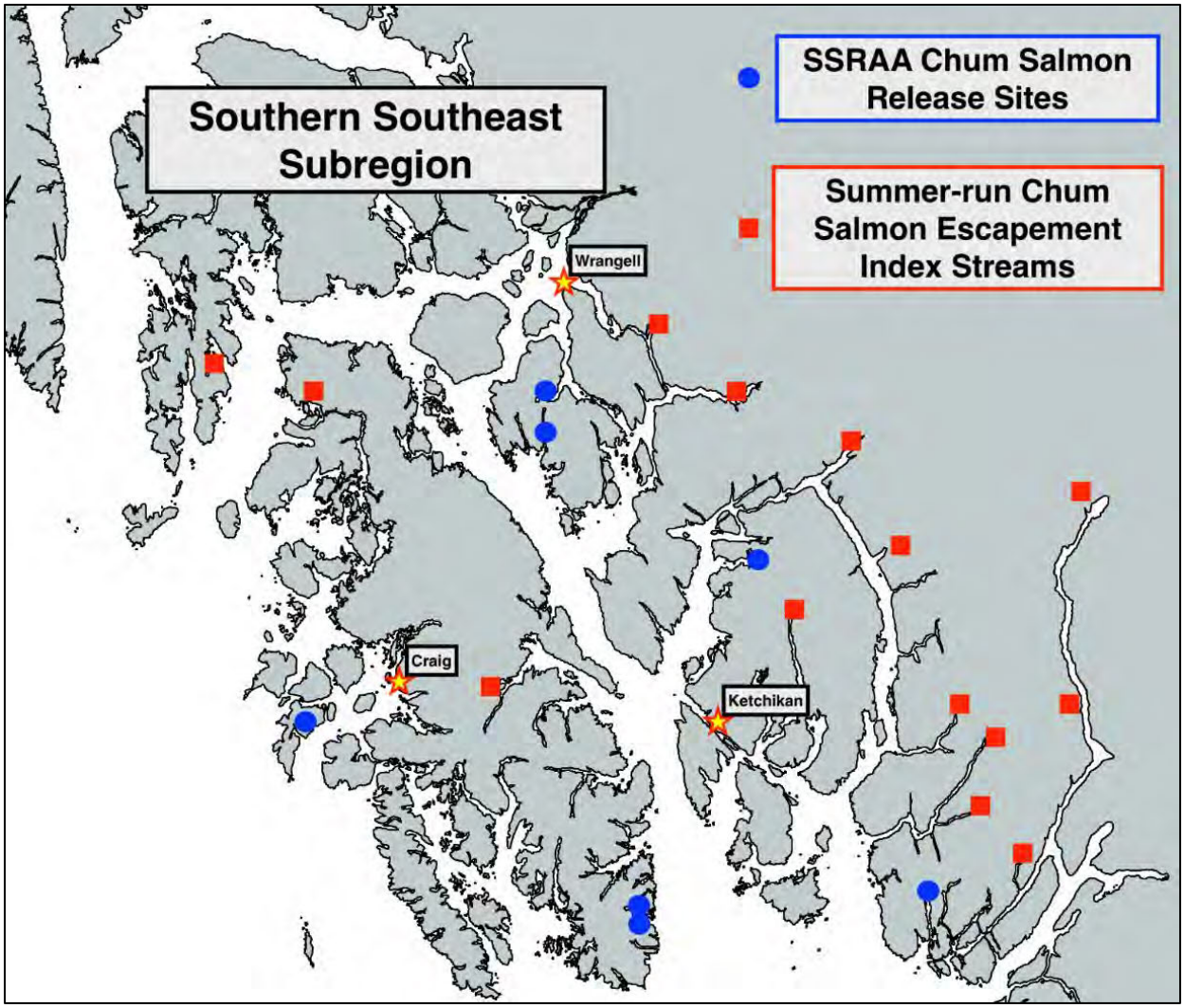


Figure 1. SSRAA chum salmon release sites and ADF&G summer-run chum salmon escapement index streams in the Southern Southeast Subregion.

In 2025, SSRAA-produced salmon contributed $16.4 million to the commercial fishing sector in SSE, with 75% of that value derived from chum salmon. Additionally, approximately 30,000 Chinook and coho salmon were harvested by the sport fleet, providing significant economic, social, and cultural benefits to communities throughout the region. SSRAA's operations are funded through salmon revenue generated by cost recovery (80%), the salmon enhancement tax (14%), and the ADF&G Sport Fish Division (6%) (Figure 2). Of SSRAA's cost recovery revenue, 69% is derived from chum salmon, compared to 9% from coho and 2% from Chinook salmon. A 25% reduction in chum salmon permitted capacity would have cascading effects, reducing Chinook and coho production and diminishing opportunities for sport, subsistence, personal use, and commercial fisheries.

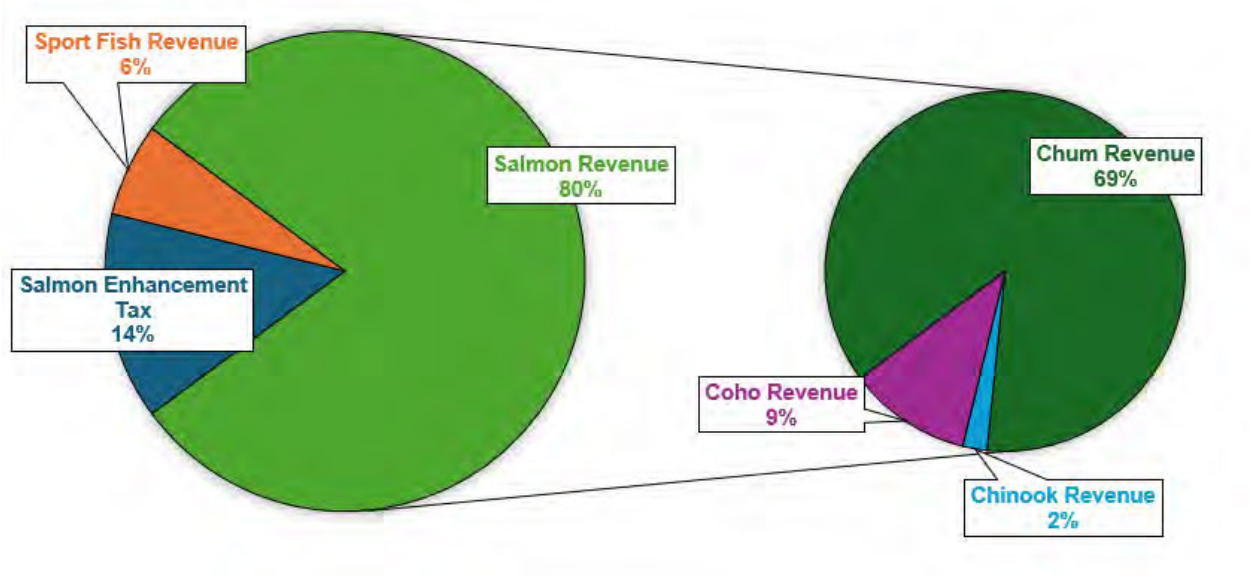


Figure 2. SSRAA Revenue Sources.

SSRAA's permitted production levels were designed to balance opportunity among the seine, gillnet, and troll fleets. Chinook and coho salmon releases represent the majority of SSRAA's contribution to the troll fleet, which remains below its allocation level. Because yearling production (Chinook and coho) is significantly more expensive than chum salmon production while generating substantially less cost recovery revenue, an arbitrary reduction in chum capacity would disproportionately harm the Southeast Alaska troll and sport fleets without providing measurable benefits to wild salmon. Moreover, implementing production cuts through this mechanism would undermine the established scientific and public review process conducted by the ADF&G Commissioner and Regional Planning Teams (RPTs).

In closing, **please vote in opposition to Proposals 170, 171, and 172**. Alaska hatcheries have operated for 50 years in close coordination with ADF&G, stakeholders, and the public through an open and transparent process. This year, SSRAA celebrates its 50th anniversary, an achievement that reflects decades of responsible management and collaboration. There is currently no sound scientific evidence demonstrating that reducing hatchery salmon production would produce positive effects on wild salmon stocks in Alaska. However, the economic, cultural, and social impacts of such reductions to the communities we serve would be immediate and substantial. Adoption of these proposals in any form would establish a precedent allowing hatchery production to be altered arbitrarily, outside of the full RPT scientific and public review process. The work you do and the time you dedicate to the Board of Fisheries are greatly appreciated. I am available to provide any additional information or clarification regarding these proposals.

Respectfully,

Tessa Fost
General Manager SSRAA

Submitted by: Rita Spann
Community of Residence: Cordova

I'm an Area E Permit holder and am strongly in support of Proposal 162. Subsistence fishing should not be commercialized anywhere in the state.

I support Proposals 163, 164 and 165. If vessels are bottom trawling they need to be held accountable to bottom trawling management. Adopting these monitoring tools and regulations will make Alaskan fisheries management more accurate and sustainable.

I strongly oppose Proposals 170, 171 and 172. Alaskan hatchery programs are vital to sport, commercial and subsistence fisheries all over the state. Blunt cuts to production are not a sound management strategy and should not be implemented.

Submitted by Mark Spencer

PC446

Proposal 175-Oppose

Introduction: Expert observations.

Having personally overserved hundreds of king salmon caught and released by dipnets on the Copper and Kenai Rivers over the past 15 years of operating a dipnet charter on the Copper and Kenai Rivers and observing the public adjacent to us I have witnessed a conservation minded approach to release of non-retention kings by dipnetters. There are approximately 40,000 annual household dipnet permits pulled each season in Southcentral alone. Many of these households possess and fish multiple nets likely requiring in excess of 100,000 nets that would have to be restrung at $35-50 per net.

Safety Matters: Nets should be secured to the boat!

Safety is paramount on the water while dipnetting for salmon in Subsistence, Personal Use and Commercial dipnet fisheries from a boat. Alaska's rivers are particularly unforgiving to those unfortunate souls who fall into our rivers. Many of these accidents result in fatalities annually.

Holding a dipnet by hand while power trolling in swift water on a boat is dangerous, to nearly impossible, without the net being secured to the boat. Without the net being secured, it puts the dipnetter over the gunnel of the boat in an awkward position, often in a way that shifts their center of gravity outboard increasing by orders of magnitude the likelihood of falling out of the boat and getting washed under the vessel and into the propeller or jet drives resulting in serious injury or death.

Having nets secured to boat helps reduce the likelihood of the fishermen getting pulled overboard when the net is fouled on a rock, or other debris. It keeps people inside the boat. The line effectively prolongs deceleration making the fouling less abrupt giving the fishermen time to either release the net or alternatively the line adds enough tensile strength to overcome the snag and pull it free. This prevents the loss of gear that can cost upwards of $250-$350 per net depending on configuration. The line secured to the pole and the boat effectively acts as a handrail to those fishing offering 3 points of contact increasing stability for all fishermen and especially our youth, elderly and disabled Alaskans.

Gear Type: 4.5" Mesh good for commercial gill net king conservation but not for dipnets?

Currently 4.5" mesh is the most common size of webbing that is commercially available in Alaska for dipnets. In discussions last week with LFS Donaldson's there are no commercially available webbing options outside what is currently available.

While fishing from a boat, the dipnet web tends to stay open (inflated like a balloon) while the net is in the water fishing. When a fish is suspected the net is pulled upwards, and it stays inflated all the way through the water column to the surface and only starts to collapse on itself when pulled out of the water and/or by the faster moving surface current. At that point, the fish is lifted into the boat to be harvested or if it is a non-retention species the net is manually flipped and the fish is released over the side of the boat. Often the non-retention species does not even come over the gunnel. The difference between catching a sockeye and king in the dipnet are instantly and abundantly clear when retrieving the net. Dipnetter and crew can easily prepare for release if applicable prior to the net reaching the surface.

4.5" Mesh Facts:

- 4.5" mesh tents to allow larger kings to be rolled out of the net more easily with bigger openings in the webbing their fins, teeth and nose are more easily cleared from larger non gilling mesh making expeditious release more likely.
- 4.5" mesh tends to foul the sockeye making it ideal for use by younger, older and disabled fishermen. Sockeye being the targeted species.
- 4.5" mesh is ideal in currents that make net retrieval difficult from the beach or boat as sockeye foul in this webbing more.
- 4.5" mesh seems to be the preferred mesh size when restricting commercial gear to conserve kings. A dipnet is a scalpel and non-targeted fish can be released with relative ease.

Conclusion:

All dipnet caught fish and notably Non-targeted fish such as King Salmon when applicable are quickly pulled up the water column from depths for 2'-15' feet of water by dipnets. In nearly all cases, the king is pulled up and released from the net in less than one to two minutes with only a 10-15 second effort to bring them up to the waters surface where we can begin to release the fish. Notably, occasional fouling does happen and would happen regardless of mesh size but the overall short handling time of these hardened fish and their immediate release is not supported by the proposer's casual observations of dipnet released mortality.

Conspicuously absent is any known effort by the proposer to provide public outreach to demonstrating best practices or less harmful release techniques to fish they are concerned about. Further the proposer insists on 100% retention of all kings caught in a fishwheel. Each fishwheel permit holder can retain as many as 500 kings per subsistence permit. 5 kings are allowed to be retained in both state and federal subsistence if harvested by boat. No conservation consideration is given on removing kings from a fishwheel live well in an effort to conserve, rather all efforts are consistently focused on restricting access and opportunity by boats in the Personal Use Dipnet fisheries in southcentral and statewide that feed Alaskan families.

Submitted by Mark Spencer

PC446

Proposal 162-Oppose

Introduction: The History

In 2021 at the Cordova meeting for the PWS finfish meeting the BOF members made it clear that the board would not be restricting transport services to state subsistence users after taking action to ban charter access to residents in these state subsistence fisheries. In building the record the board stated by allowing transport services to remain, they were not restricting access to residents of Alaska who are all eligible to participate in state subsistence fisheries.

The users above and below the PU fishery on the Copper have taken a local issue and pushed it statewide banning charters in subsistence fisheries across the state. They continue to try and take additional bites at the apple to restrict access of residents to subsistence fisheries by submitting the same proposal cycle after cycle, in their local fishery, the Kenai and statewide meetings.

No-biological Backing: Conservation is not the issue

The restriction to state subsistence fisheries absent of a biological concern presents a clear attempt by proposer to reduce users of the resource. The Copper River has extremely limited public access to and proposers Native Corporation holds most uplands adjacent the river further underscoring the benefits of transport access to by both state and federal subsistence users in the area.

Conclusion

The Board has unanimously declined to affirm this proposal at the 2021 & 2024 PWS FinFish Meeting, the 2023 Statewide FinFish meeting, and the 2024 Upper Cook Inlet meeting and I would expect the board to do it again this same this time around, ensuring subsistence access to residents of Alaska. Especially when no conservation concern exists.

Submitted by: Laura Stats
Community of Residence: Juneau

Dear Board of Fish,

I am in favor of the proposals below for the pelagic trawl fish fleet.

Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.

Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.

Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

I am a Southeast Alaskan who has family and friends in the Southeast area fishing fleets. Through these contacts I have been aware for decades that both pelagic and bottom trawl fisheries need improved monitoring due to bycatch issues.

These proposals are long overdue, common sense and should have been enforced years ago. Unfortunately now we have climate warming issues that are greatly impacting salmon returns. Salmon have existed on the planet for millions of years. Will it be a sad fact that during our time they will dwindle to extinction?

Implement these changes asap.

Laura Stats

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Jack Stevenson, and I am a commercial fisherman based in Cordova, Alaska. I am also a subsistence fisherman, sport fisherman, and direct marketer. My gillnetter is the F/V Legend, and I am a third-generation fisherman.

If Proposals 170, 171, and 172 are adopted, it will significantly reduce my chance to make a decent living for my family, because we depend heavily on these salmon showing up every season. Salmon already have a low return rate due to many obstacles at each stage of life, whether low food availability, predation, or changes in ocean temperatures and conditions. Reducing hatchery production will give us even smaller returns than what we have been facing.

Cordova and outlying fishing towns rely heavily on residents having good seasons to afford putting money back into the local economy. If we fishermen can hardly afford to meet our basic needs, we will not be spending money at local businesses in these communities. There is a major ripple effect in smaller communities where a majority of residents rely on fishing as income.

Our hatcheries have given fishermen a great opportunity to provide great food to the world while making a decent living wage in an ever-changing world. With the rising cost of fishing equipment, fuel, food, and housing, we need every possible chance at healthy and plentiful salmon returns to stay competitive and sustain our livelihoods.

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

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

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address. Collectively, these proposals abandon Alaska's science-based, adaptive management

framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

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

Jack Stevenson
Cordova, Alaska
[redacted]

March 2, 2026
Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

RE: Oppose Proposal 186 – Upper Cook Inlet Drift Gillnet Restrictions

Madam Chair and Members of the Board:

My name is Penelope Haas, I am a commercial fisherman in Cook Inlet and owner of Stickleback Fish Company, a sea-to-table business offering fresh, smoked, pickled, and cured salmon in Homer, Alaska. We are a young and growing business with Alaskan employees and we rely on good management of the EEZ fishery. I am writing to ask you for both near- and long-term improvements to the management of the Cook Inlet EEZ.

First and foremost, I want to underscore that thousands of people depend on this fishery for our livelihoods. Made up of many small businesses, Upper Cook Inlet commercial fishermen bring in important revenues to the State of Alaska and our local communities; our fishery goes back to the 1880s and has deep roots in towns up and down the Kenai Peninsula. Your decisions will impact people starting their families, building or buying homes, saving for their kids education, putting money away so they can retire.

I **oppose Proposal 186** and urge the Board to either **reject the proposal or decline to take action outside the regular cycle**.

Concerns

The proposed restrictions would apply regardless of run strength, including in years of strong returns. This is not the way to manage salmon: we need to manage on the basis of inseason escapements, and use scientific benchmarks to guide department decisions. While it is true that Coho escapements in the Deshka and Little Sue have not been met recently, that is not the whole story. We ask the Board to weigh these other important factors:

a. Other user groups are muddying the water: consider that in any given year, it is typical for sport harvest to be equal to the escapement in the Little Susitna, one of our two indicator streams.[1] Considering that this sport harvest data comes from voluntary harvest reports, rather than any kind of mandatory record keeping, it is safe to say that real sport harvest is quite a bit higher

[1] Fishery Manuscript No. 24-01 Review of Salmon Escapement Goals in Upper Cook Inlet, Alaska, 2023 by Timothy R. McKinley, Jack W. Erickson, Tony Eskelin, Nick DeCovich and Hamachan Hamazaki. January 2024, p. 59.

than estimated.[2] Even if you shut the commercial fleet down completely, this would still be a substantial obstacle to meeting escapement goals in the indicator streams.

b. Reported sport harvest in the Cook Inlet is significant, and is at parity with Commercial Coho Harvest: in 2024 reported harvest was 72,582, in 2023 reported harvest was 86,578, 2022 reported harvest was 120,698. Closing off an entire area for the commercial fleet while placing no restrictions on Sport Harvest would be discriminatory and irrational. If you are concerned about Coho abundance in Cook Inlet, you would place restrictions on all user groups.
c. Data collected on coho escapement are not accurate, they are undercounts, as the Alaska Department of Fish and Game themselves recently stated:

> "Both the Deshka and Little Susitna River coho salmon weirs have experienced flooding or early ending of the project due to funding. Because of that, those counts are considered minimum or incomplete estimate of coho salmon inriver abundance. Deshka River coho salmon weir counts have been incomplete each year since 2020. Little Susitna River coho salmon weir counts have been incomplete each year since 2022. Fall weather and high water make consistent operation of these weirs difficult."[3]

Administrative Procedure

Proposal 186 does not meet the standard for consideration as an out-of-cycle Agenda Change Request (ACR), as outlined by the Department of Fish and Game itself (see above). Under Alaska law ACRs are reserved for unforeseen or imminent conservation or biological issues that arise outside the regular cycle and require immediate Board action.

Proposal 186 identifies no such circumstance, and no immediate risk exists that current management tools are unable to address. The proposal gives itself away by seek *permanent* regulatory changes to what they claim to be an immediate and unforeseen issue. Coho are notorious for high variability of returns and it is not appropriate to shut down an entire fishing area forever because of several years of poor returns (when the data on all those years has been bad).

---

[2] https://www.adfg.alaska.gov/sf/sportfishingsurvey/

[3] ALASKA DEPARTMENT OF FISH AND GAME STAFF COMMENTS ON AGENDA CHANGE REQUESTS ALASKA BOARD OF FISHERIES WORK SESSION ANCHORAGE, ALASKA October 28–29, 2025, p. 7. Online at: https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2025-2026/ws/adfg-staff-comments.pdf

Request

I respectfully ask you to **reject Proposal 186**, or in the alternative, decline to take action outside the regular cycle and postpone consideration until the regularly scheduled Upper Cook Inlet meeting in March 2027.

Sincerely,

Penelope Haas

Captain, F/V Kustatan
Owner, Stickleback Fish Company
Beautiful Wild Cook Inlet Salmon
[redacted]

PC450

Submitted by: Frede Stier
Community of Residence: Palmer, Alaska

I'm writing to support Proposal 186, because the streams in the Mat-Su Valley are the locations where I could catch salmon in the past, before instream salmon shortages, restrictions, and closures started occurring during the last three years. I believe the commercial drift gillnet fishery -- which has been harvesting an increasing number of coho salmon needs to be managed in more conservative manner in order to allow more coho to make it to Mat-Su stream drainages like the Deshka and Little Susitna River. These are two locations where I and many other folks in the Mat-Su Valley have relied on for years to harvest fish for the year. Thank you for considering Proposal 186 and conservation amendments to the Central District Drift Gilnet fishery Management Plan as a way to help maintain sufficient coho salmon returns to meet escapement needs.

PC451

Submitted by: Ivan Stonorov
Community of Residence: homer

To the Alaska Board of Fisheries,

I oppose the Commercial Finfish Proposals 170, 171 and 172.

Don’t mess around with what works. The hatchery program has been one of the most successful non-profit organizations in Alaska.This program has provided a sustainable source of food and employment for thousands of people.

There is concern about straying of hatchery fish and their fitness. All salmon species have a small percentage of individuals that stray, that is how they survive natural events like large floods and freezes. When there are huge returns, there is going to be more straying of both hatchery and wild stocks.

Studies show that second generation fish have greatly improved reproductive success whether they are pink or chinook Salmon. This is illustrated by a conclusion from the ADFG hatchery research project “Second-generation offspring of hatchery strays show reduced fitness, but the decline is much less severe than in the first generation, particularly in the odd lineage. Relative Reproductive Success F0´F1 F1Í F2 Even lineage 0.481 0.727 Odd lineage 0.279 0.848.” (spawning success even year 48.1% first generation 77.7% second generation odd year 28% first generation 84.8% second generation.) ”Another quote from an article in Science Daily shows similar findings. They write," we found that the first-generation descendants of hatchery-origin Chinook salmon produced more offspring than hatchery-origin salmon spawning alongside them in the river, meaning that reproductive success may improve in the wild as quickly as it declines in the hatchery.” These results were recently published in the journal Evolutionary Applications. The paper's lead author is David Dayan, who was a faculty research assistant in O'Malley's lab and now works for the U.S. Fish and Wildlife Service.

Proposal 171 gets it’s numbers from a study done by the ADFG in Pink Salmon Hatchery Proportions in selected Lower Cook Inlet Commercial Fisheries from 2015–2018 by Ted Otis and Glenn Hollowell. This proposal seems to be manipulating numbers, 22% straying from PWS is not quite correct. I think that 22% represents the percentage of otolith marked fish that were sampled with PWS markings. Also many of these samples were taken during the blob/warm years when the salmon did not behave normally. It appears that some years there was very little straying and other years there was more. Looking at the places that were sampled where there are normally robust runs of pinks, these streams had very little straying. Humpy Creek for instance had .08 percent straying. Less robust systems in areas that act as natural fish traps on the outer coast and streams like Fritz Creek that have very little return because most of the fish spawn in the intertidal area and freeze also had high percentage of hatchery fish most likely because there were limited numbers of wild fish in these extremely small streams. The conclusion of this study states that the “current data set is limited given a

small number of years sampled." Further there is a need to "continue sampling based on a comprehensive study design."

The Prince William Sound hatcheries have seen the return of more than 35 generations of salmon to the region with continuing robust returns. These returns have secured the livelihood of the fisherman involved in the harvest in PWS, and has provided food security on a national level. Any disruptions to the hatcherie's production of salmon would have severe consequences to the Alaskan economy, and national food security. Please look at the science and realize that we are living in a changing climate. Not all salmon species are going to fare well in the ocean or in streams that are much warmer than normal.

Sincerely,

Ivan Stonorov

Lifelong Alaskan, commercial and sport fisherman, and current PWS Seiner

---

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Jordan Stover, and I am a commercial fisherman in Prince William Sound based in the Kenai and PWS region.

The hatcheries I commercially fish are already facing more pressure from sport and charter users, and these proposals would mean less fish for everyone. These changes could shut down commercial fishing businesses — not charters or sport operations, but the commercial fleets that pay for the hatcheries and help feed others.

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

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

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

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

Jordan Stover
Kenai/ PWS, Alaska
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is David Street. I am a former president of the Southern Southeast Regional Aquaculture Association (SSRAA), a former member of the Southeast Alaska Regional Planning Team, and a Southeast Alaska seine fisherman.

Southeast Alaska hatchery production is vital for the economic and social success of both the sport and commercial fisheries. There is no science-based rationale for supporting these proposals.

The economic impacts to Southeast Alaska communities would be significant, including elimination of many sport fishing opportunities and great harm to the economics of the troll, gillnet, and seine fisheries, as well as the processing sector. Management must be based on solid science, not falsehoods and scapegoating.

Making major changes to hatchery programs based on falsehoods and grievance results in poor policy that will produce economic wreckage. We need to adhere to science-based policy.

In Southeast Alaska there is always great variability in the survival of natural salmon returns. Hatcheries have contributed to a more stable fishing industry and stronger communities.

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

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

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 Street
SE AK, Alaska
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Sven Stroosma, and I am a commercial fisherman in Southeast Alaska. I operate the F/V Voyager.

I am writing to urge the Board to reject Proposals 170, 171, and 172. If these proposals are adopted, they would negatively impact my family's livelihood and the viability of my business. They would reduce harvest opportunities and processing jobs and diminish economic stability in Southeast Alaska.

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

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

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

Sincerely,

Sven Stroosma
Southeast Alaska
[redacted]

Alaska Board of Fisheries
March 17, 2026
Anchorage

Comments
John Sund
[redacted]
Craig, Alaska

COMMENTS ON BOARD PROPOSALS: 170, 171, 172.
RE: Board Authority: AS 16.10.440(b)

INTRODUCTION
I direct my comments to the discussion on Board Proposals: 170, 171, 172, regarding the authority of the Board of Fisheries as stated in AS 16.10.440.

RECOMMENDATION
I strongly recommend the Board not attempt to use the reference to source and number of salmon eggs in AS 16.10.440(b) as a vehicle to amend permits issued by the Commissioner under the nonprofit hatchery statutes.

REVIEW OF STATUTE
The Board has wrestled with the authority of the Board regarding the private non-profit hatchery program for many years. The Department of Law has written memorandums to the Board regarding the question of Board authority over the past 20 – 30 years. I can bring a historical perspective and background surrounding the drafting of the section and provide a historical context to assist in the review and discussion.

In 1976. AS 16.10.440 read

(a) Fish released into the natural waters of the state by a hatchery operator under secs. 400-470 of this chapter are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.
(b) The board may promulgate regulations necessary to implement secs. 400-470 of this chapter.

This section created a layer of confusion in terms of how the nonprofit hatcheries were going to operate. The statute vests detailed authority in the Commissioner to implement and manage the creation, operation and permitting of nonprofit hatcheries. How were the nonprofit hatcheries to get permits if the Board of Fisheries is required to promulgate regulations to implement the same sections as delegated to the Commissioner?

The legislature decided to place the implementation of the nonprofit hatcheries and permitting and comprehensive planning with the Commissioner. And leave the allocation of the fish in the common property water to the Board of Fisheries.

In 1979. AS 16.10.440 was amended to read:

> (a) Fish released into the natural waters of the state by a hatchery operated under AS 16.10.400 – 16.10.470 are available to the people for common use and are subject to regulation under applicable law in the same way as fish occurring in their natural state until they return to the specific location designated by the department for harvest by the hatchery operator.
>
> (b) The Board of Fisheries may, after the issuance of a permit by the commissioner, amend by regulation adopted in accordance with AS 44.62 (Administrative Procedure Act), the terms of the permit relating to the source and number of eggs, the harvest of fish by hatchery operators, and the specific locations designated by the department for harvest. The Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400-16.10.470.

The last sentence in subsection (b) was included as a definitive statement that the Board of Fisheries may not adopt any regulations or take any action regarding the issuance or denial of any permits required in AS 16.10.400 – 16.10.470. When this section is read in the context of the of the statutes dealing with non- profit hatcheries it is clear the legislature put the Commissioner in charge of the non- profit hatcheries. And the Board of Fisheries with the authority to regulate the harvest of salmon in the common property.

It is difficult to envision what and how a Board regulation would look like in terms of amending a permit? What criteria would be used? How would the impacts be measured? How would it affect the financial structure of the company? All these issues are considered by the Commissioner when granting the permit. There is a process through the Regional Planning Team, public hearings and staff recommendations to arrive at the decision.

There is a robust and comprehensive process set out in the statutes providing for public comment and input into the decision-making structure for managing nonprofit hatcheries. If there is a problem or issue that arises after a permit is issued the Commissioner can make a finding the hatchery is not in the best interest of the public and alter the conditions of the permit under AS 16.10.430. There are examples of the Commissioner using the power granted in the statutes to deal with breaches of permits. The Commissioner closed the Meyers Chuck hatchery due to noncompliance. And, revoked the permits for Alaska Aquaculture due to default on debt. There are ways and means built into the existing statutes to deal with many of the issues of concern.

HISTORICAL BACKGROUND

I worked on drafting the legislation and regulations as an attorney for Southern Southeast Regional Aquaculture Association (SSRAA) and staff to the legislature in 1977 and 1979-80.

This amendment is confusing and is causing a great deal of angst among the Board and hatchery operators. What does it mean? The legislature could have just adopted the last sentence and said the Board of Fisheries may not adopt any regulations or take any action. But the legislation includes three carve-outs of authority for the Board. Two of the provisions make sense in terms of the Board authority to deal with allocation of fish in the

common property. The harvest of fish by hatchery operators and the specific locations. The third provision relating to the source and number of eggs is creating confusion in terms of the management, long term planning and operation of non- profit hatcheries.

The legislation setting up a comprehensive framework for the creation and management of private non-profit hatchery was adopted over a few years. It was a new endeavor and as the implementation took place various unknown factors arose, and the legislature passed new and clarifying statutes to address the issues. The primary legislation was adopted in 1974, 1976, 1977, 1978 and 1979 and there were a few additional changes in later years.

It was new territory to balance the oversight of the creation of hatcheries operated by private non-profit entities. The use of common property resources and public resources to build hatcheries that produce salmon for harvest in the commercial, sport and personal use fisheries. The challenges included a balance between public input and consideration of use of public assets, the private financing through assessments on commercial fishermen and loans from the state and the need for stability in the planning, production and financing.

There was also a need to proceed with expediency to get the process going and keep it going. This had never been done before. It was a new social experiment in a public – private partnership. There were no models in the world to follow. It was new ground for everybody.

The initial legislation in 1974 creating private non-profit hatchery was one or two sentences. From there the idea started and different areas of the state began to explore options. The challenges from how to finance to site selection, brood stock egg takes, organization of managing entities needed solutions.

Voluntary assessments in Prince William Sound worked for one year but proved to be unreliable. It was a new program and concept. Mandatory assessments to be collected by processors and sent directly to associations were found unlawful in the Wayne Alex case. Legislation was amended to recognize the assessments as a tax payable to the state and deposited in the general fund. The enhancement loan fund needed clarification regarding the accrual of interest on outstanding balances.

Many of these issues came to a head in 1977 – 1978. The 1978 legislature appropriated $100,000 to set up the Aquaculture Policy Study Group. The Letter of Intent for FCC for SCS for CSHB 920 opening paragraph:

> "The Aquaculture Study proposes to clarify statutes authorizing private nonprofit salmon hatcheries so that management authorities such as the Department of Fish and Game and the Board of Fisheries can better understand and implement the intent of the Legislature."

The Aquaculture Study Group was organized in July and met in September and later in the fall 1978.
Six major areas of concern were chosen to be addressed by the study group:

1. Clearly define the State's policies on Aquaculture – examine existing statutes/ resolutions/policies
2. Stock Management

3. Define roles of organization and groups
4. Land Use problems
5. Cost/Benefit analysis of private and state projects
6. Research Base

There were a lot of areas of confusion and overlapping jurisdiction and policy and procedures to work through. The ideas, recommendations and concepts from this study led to many of the provisions adopted in the 1979 legislation. Including the change to AS 16.10.440.

The section is related to the need to harvest the initial brood stock from wild salmon spawning streams. At the time (1978-79), there was a lot of discussion of how and where to source the initial brood stock and how that may impact the production of wild salmon streams. The selection of the streams for hatchery brood stock involved discussion at the Regional Planning Team, between regional hatchery managers and the Department and the US Forest Service. Access to many streams involved crossing Forest Service land. Setting up temporary camps on streams. Building weirs in the streams to trap salmon. Deciding how many salmon to harvest for hatchery brood stock. Impact of the brood stock taking on the overall production of that stream. It was complicated. And getting it right was important.

It provided a means for the Board of Fisheries to act upon a permit granted by the Commissioner for the egg take from wild salmon stocks in specific stream. The Board of Fisheries never reviewed or questioned any of the Commissioner decisions on collection of the initial brood stock for hatchery from wild salmon streams either in the state owned and operated hatcheries or the private non-profit hatcheries.

This section (b) was intended for the Board to have an opportunity to look at the gathering of hatchery brood stock from wild salmon streams. The other sections in .440(b) relate to the Board authority for harvest of salmon in the common property including harvest by hatchery operators. The provision dealing with amending permits for source and number of eggs does not fit with the scope of the overall statutory design to place authority for oversight of non-profit hatchery with the Commissioner and allocation of salmon in the common property with the Board of Fisheries.

It was not intended to be a vehicle for the Board to step in at any time on a permit-by-permit basis to amend or revoke permits issued regarding sources and number of salmon eggs taken from stocks returning to the hatcheries or transferred between hatcheries. If that were the case the entire statutory framework for management and operation of non-profit hatcheries is upended. The planning, operations, financing, and site selection is placed in limbo. And subject to intervention by the Board of Fisheries on an ongoing basis. Either through emergency action or through the regular Board cycle. The unknown factor looms very large in every decision. This is what the original planners and drafters of the non-profit hatchery program were trying to avoid.

END

PC456

Submitted by: Dan Suprak
Community of Residence: Wasilla

I live in and guide fishing in the Mat-su valley. I support proposal 186. I have seen the decline in fish within the upper Cook Inlet in rivers such as Deshka and The Little. Susitna. These rivers numbers of fish are declining so bad that ADFG has had to shut them down not. only for King salmon but now Coho. If we do not do something here in the near future these rivers will become decimated. This will not only hurt the people who rely on this rivers for fish but the local economy. The Deshka River was once one of the best fishing rivers in the state and sadly it no longer is. Please consider proposal 186.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Ray Sutton, and I am a Prince William Sound salmon seiner based in Valdez, Alaska. I fish aboard the F/V Cape Trinity, and I am a third-generation commercial fisherman. I have worked in this fishery for 35 years, and I would love to see my children become fourth-generation fishermen.

Pink salmon are our main source of income, and in most years over half of the salmon I catch are of hatchery origin. If hatchery production is significantly reduced, it will have a significant impact on the local economy. The commercial fishing vessels, fish processors, and hatchery are large employers in this community. If reductions affect silver salmon production, that will also impact the largest swell of tourism in Valdez, including sport charters, campgrounds, local restaurants, hotels, and shops.

These proposals would ruin our family fishing business and make it unsustainable to pass on to my children. It appears that certain groups are looking for a villain to point at without scientific evidence. The hatchery was producing salmon for many years without a correlated impact on wild stocks. Hatcheries are not new. Wild stock declines should be studied, but in my view this is not due to hatcheries.

When it comes to pink salmon, we will probably never be paid a premium price. With the help of hatcheries, though, we are able to produce a low-cost protein and still operate a profitable family business. Making non-scientific guesses about the fishing industry could end our family's commercial fishing legacy. Scientific research can be done without experimenting by tanking the economies of numerous small Alaskan communities and small local businesses around the state.

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

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

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

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

Ray Sutton
Valdez, Alaska
[redacted]

PC458

Submitted by: Robert Swanson
Community of Residence: Petersburg

Proposals 170 , 171, 172

I oppose all. I need hatchery fish to make a living for my crew and myself

---

PC459

Submitted by: Steven Swartzbart
Community of Residence: Cordova

Steven Swartzbart

[redacted] Cordova, AK 99574

I grew up in Cordova and have been commercial fishing my whole life. I am a second generation fisherman and took over my fathers PWS drift gillnet operation 10 years ago. I appreciate the opportunity to speak in opposition of proposals that will be devastating to my livelihood and community.

Support 164

This will give more accountability to the pelagic trawl fleet and monitor trawl nets contacting the bottom of the ocean. This will also help demystify the trawl fisheries and hopefully improve fishing practices.

Support 165

Salmon bycatch is a problem in trawl fisheries and this is a step to mitigate the issue.

Support 169-Amendments

Amendments should be made so state and federal have the same pot requirements.

Oppose 170

Oppose 171

Oppose 172

There will be little to no benefits to reducing the egg take in PWS hatcheries. It will also be near impossible to measure if there are any changes. Alaska hatchery pink only make up 2.1 percent of the total adult and immature biomass in the North Pacific, and an egg take reduction will only hurt costal communities.

PWS hatcheries had salmon first return in 1978. Hatchery salmon have been returning and straying for about 47 years. The 50 year long experiment has been successful in strengthening fisheries with hatchery fish alongside abundant wild returns in Prince William Sound.

King Salmon are declining across the state. It is devastating to the subsistence communities who have relied on these fish for longer than I can comprehend. Commercial salmon fisherman have seen huge reductions in time and area, literally changing the nature of the fisheries.

Climate change is a top contributor to why king salmon are struggling and the changing climate is the biggest threat to Alaska subsistence, commercial, and sport users. The warming ocean and river temperatures reduce oxygen in the spawning beds, increase parasite loads, increase metabolic rates, and limit or change food sources. This is very concerning and the best way to bring back King Salmon across the state is addressing climate change and not a reduction of salmon from hatcheries. I encourage the board and the public to put their energy towards management frameworks that adapt to climate change and not baseless cuts to important hatchery programs.

If 170-172 pass, or a version of these proposals, there will be negative consequences for every user group. Cutting egg take of pink and chum will lower the number of fish available for cost recovery and lower common property harvest. This would subsequently lead to possible cuts on non revenue generating programs like kings and silvers that are targeted by sport users. These proposals will hurt sport fisherman. Hatchery fish are used for subsistence in Prince William Sound. Cutting pinks and chums will negatively impact the hatchery system as a whole and could lead to elimination of sockeye programs that subsistence users rely on.

Support 174

Support 175

Support 180

Oppose 187

Rivers are always changing and especially in this region with so many glaciers, strong currents, and sand bars. Fish and Game has the power to change how the fishery is conducted with closures and stat areas to address the shifting rivers. There is no conservation concern here and is not a fully utilized fishery. This is the last place that needs a closure from the board of fish.

References

Lizabeth Bowen, Vanessa R von Biela, Stephen D McCormick, Amy M Regish, Shannon C Waters, Blythe Durbin-Johnson, Monica Britton, Matthew L Settles, Daniel S Donnelly, Sarah M Laske, Michael P Carey, Randy J Brown, Christian E Zimmerman, Transcriptomic response to elevated water temperatures in adult migrating Yukon River Chinook salmon (Oncorhynchus tshawytscha), Conservation Physiology, Volume 8, Issue 1, 2020, coaa084, https://doi.org/10.1093/conphys/coaa084

Update on Alaska Hatchery Salmon Production,

Research and Management (2024)

for a Marine Stewardship Council Audit of Alaska Salmon, January 6-10, 2025.Prepared by Granite Bay Biological, on Behalf of the Alaska Fisheries Development Foundation

---

PC460

Submitted by: Phillip Tafs
Community of Residence: Anchorage

I am writing to OPPOSE proposal 175, specifically the ban on tying the net to the boat. This proposal would functionally close dipping from a boat. It would limit access to a public resource and diminish my ability to fill my freezer and feed my family. I strongly OPPOSE proposal 175.

PC461

Submitted by: Zach Tanner
Community of Residence: Girdwood

It’s crazy that trawlers are allowed to operate anywhere! I support a total ban on trawlers in Alaskan waters. Do the right thing and end this madness. Give the marine life a chance to comeback , total ban for 5 years and watch what happens.

The bycatch alone should spin your freaking head off , and the absurdity that private citizens can’t even put one toe out of line for fear of heavy fines and penalties.

Trawlers pull up whales, sharks, seals, sea lions, every possible fish , crabs, starfish……. What else do you need to see before we can finally put an end this?

Submitted by: Mark and Lucy Teitzel
Community of Residence: Anchorage

We support Proposal 186 inorder to increase the number of Coho salmon reaching the Susitna River Drainages.

We enjoy sportfishing for Coho Salmon in the Susitna drainage.

We cringe when there are an over abundance of sockeye salmon in the Kenai and Kasilof Rivers because it means that we will face sportfishing restrictions on coho salmon in the Susitna Rivers and drainages ranging from no bait, only one fish and finally no sportfishing while 1000's of coho's are harvested by nets supposedly targeting sockeye before they even reach the river.

And even worse is that according to ADFG, not enough coho's are reaching the spawning beds to sustain future runs.

It appears that commercials may actually be targeting cohos instead of sockeye with cohos being a higher value fish which will only get worse as the number of cohos continue to decline.

This is rediculous when ADFG allows more openings for the goal of reducing the number of sockeye into the Kenai or Kasilof Rivers and needs to be stopped for the sake of having future coho runs into the Susitna River.

Please support Proposal 186.

Thank you.

Mark and Lucy Teitzel

Territorial Sportsmen, Inc. – Opposition Comments on Proposal 170

Territorial Sportsmen, Inc. respectfully submits this opposition to Proposal 170. This proposal would impose an arbitrary 25 percent statewide reduction in hatchery pink and chum salmon egg takes without any supporting biological data, stock-specific analysis, or demonstrated conservation benefit to wild stocks anywhere in the state. Mandating a fixed percentage reduction without evidence of need — let alone regional relevance — would be unsupported by science.

Hatchery production needs regional assessment — not a statewide mandate.
Alaska's salmon management is inherently regional. Hatchery programs throughout the state are designed, permitted, and monitored based on the unique life history traits, migratory behavior, stock composition, and user needs of each area. What may be a concern in one river system is not inherently a concern in another. Proposal 170 wrongly assumes that a broad production cut will benefit all regions equally — or that every region is contributing to the same management issues. That assumption is unsubstantiated.

In fact, the Board of Fisheries recently rejected a similar 25 percent reduction proposal for Southeast Alaska (Proposal 156) at its early 2025 meeting, recognizing that such a reduction lacked sufficient scientific support and would negatively impact fisheries and communities that rely on enhancement production without proven conservation benefit. The failure of Proposal 156 demonstrates that the Board has already considered — and declined — these arguments in this region less than a year ago.

Proposal 170 would harm northern inside waters of Southeast Alaska.
Speaking specifically on behalf of Territorial Sportsmen, Inc. and our members who fish, guide, and operate in northern inside waters of Southeast Alaska (NSEA), the impacts of this proposal would be real and adverse. Chum salmon enhancement programs in NSEA have been intentionally designed to minimize interaction with wild stocks. These programs have operated successfully for decades — providing commercial, recreational, and subsistence opportunities — under a framework of permitting, monitoring, and adaptive management by the Alaska Department of Fish and Game.

A blanket 25 percent reduction in egg takes supporting these enhancement projects would weaken productive fisheries that have no demonstrated negative impact on Yukon or other wild salmon stocks. We see no evidence that enhancement practices in NSEA are causing measurable decline in any wild stock elsewhere.

A broad, data-free reduction is unjustified and premature.
If there are scientific concerns about hatchery interactions with wild stocks in specific regions, those concerns should be addressed through regional wild stock assessment,

peer-reviewed data, and targeted management actions. A punitive, disproportionate statewide cut — untethered to measured effects — is not good fishery management.

Territorial Sportsmen, Inc. urges the Board to oppose Proposal 170 on the basis that it:

1. Imposes an arbitrary 25 percent cut without scientific evidence or demonstrated need;
2. Ignores regional differences in hatchery design, stock interactions, and fishery purposes;
3. Would harm established enhancement programs in NSEA that are responsibly managed and beneficial to local users; and
4. Repeats many of the same flaws rejected by the Board in Proposal 156 less than a year ago.

We encourage the Board to support evidence-based, regionally tailored assessments and solutions rather than broad, untested mandates that produce real harm without proven benefit.

Submitted by: Christopher Thomas
Community of Residence: Anchorage

OPPOSE 170, 171, 172

Comments are on Behalf of Chris, Germaine, Teslin and Sarana Thomas. An entire family, born and raised in Alaska. We subsistence fish, sportfish, and commercial fish.

We support science-based hatchery management and thoughtful adaptation — not blunt, sweeping cuts. Hatchery reform requires careful, data-driven adjustments, not across-the-board reductions. In Prince William Sound, hatcheries function as integrated systems. Chum and pink salmon fund research, monitoring, recovery work, sport and subsistence access, infrastructure, and decades of data collection. Cutting production without a clear strategy destabilizes the entire system for all species and all users.

Managers address issues like straying with precision tools — improved imprinting, release timing, and facility-specific changes — not speculative egg-take reductions. Ocean interaction questions are studied through targeted research such as food-web analysis, juvenile tracking, and coordinated North Pacific work. There's no clear evidence that reducing Alaska hatchery production would alter ocean dynamics, but drastic cuts would weaken Alaska's research and adaptive management capacity.

Hatcheries sustain commercial, sport, subsistence, and personal-use fisheries that coastal communities rely on. In Prince William Sound and across the Gulf of Alaska, they provide access and stability that would not otherwise exist. They are also vital recovery tools, especially for climate-sensitive Chinook, supporting rebuilding through monitoring, supplementation, and research in partnership with local and Alaska Native communities. Hatcheries are regional by design, shaped by local watersheds and priorities — and strong science works best with regional leadership.

Hatcheries are essential coastal infrastructure. They support food security, jobs, processing capacity, harbor activity, and working waterfronts. Fishing communities already face climate shifts, rising costs, and market uncertainty. Sudden statewide cuts would ripple outward — reducing jobs, incomes, and local revenues — and discourage long-term investment. Hatcheries help Alaska's fishing economy adapt; sweeping proposals risk destabilizing coastal communities without clear benefits to distant salmon populations.

Alaska maintains one of the world's strongest hatchery oversight systems, with permits, monitoring, genetics review, and adaptive management through the Alaska Department of Fish and Game. While the Board of Fisheries can amend specific permits, statewide mandates that bypass the established science-based process undermine transparency, regional evaluation, and public trust.

Hatcheries support wild stocks by stabilizing fisheries, shifting pressure from sensitive runs, and improving scientific understanding of salmon survival. Decades of hatchery production have occurred alongside strong wild runs, and many continue to thrive today.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Nyle Thomas, and I am a commercial fisherman based in Petersburg, Alaska. I operate the F/V Barbara under N Thomas Fisheries.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Hatchery-produced salmon is a large part of my business model. The reduction of fish will make it harder to meet a bottom line for many businesses.

This would affect many coastal towns that have a commercial salmon fleet, directly affecting the fishermen but also the towns that process the fish and receive a raw fish tax into the communities. A crash in salmon production means deferred maintenance on boats and processors, people moving and leaving coastal towns, and losing a global market by not filling orders — forcing the markets to look for farmed or other fish to fill the void.

Many factors can cause the decline in salmon. It could be pollution from cruise ships, trawling, or over-escaping a stream.

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

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

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

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

March 2, 2026

Dear Members of the Board of Fisheries:

My name is Hailey Thompson Ivanoff. My husband and I own and operate a commercial salmon seiner fishing out of Kodiak, Alaska. I am also a Sun'aq Tribal member and grew up fishing with my father before marrying into a fishing family.

In 2025 alone, more than fifty percent of our catch came from the Duck Bay hatchery run. A reduction in hatchery production would significantly impact our fishing opportunities and make future seasons far more uncertain.

In Kodiak, fishing drives much of the regional economy. When harvest levels decline, processors reduce operations, retailers see fewer bulk purchases, fuel docks sell less fuel, and marine trades experience reduced demand. Reduced opportunity does not only affect fishermen—it creates ripple effects across nearly every business and family in the community.

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

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

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,

Hailey Thompson Ivanoff
Kodiak, Alaska
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Ron Thomson, and I am a commercial fisherman and gillnetter based in Cordova, Alaska. I fish aboard the Strait Shot.

The Prince William Sound Aquaculture Corporation chum salmon returns at Esther Island and the Montague remote release comprise a large part of my livelihood. A 25% reduction in production would result in very little ability for the commercial fleet to continue to make a living in this fishery. The hatchery has fixed expenses, so by reducing production, the main user group affected will be the commercial fleet. There are times where the surplus after cost recovery and brood stock is only 30% of the run. In years like this, the fleet would essentially not be able to fish.

The support businesses in Cordova are struggling as it is, and any reduced income by the fleet will likely put more processors and support businesses under. Many businesses, from fishermen to processors to retail supply houses, would greatly suffer or go out of business with this proposal.

At 62, I am approaching retirement. With continued poor fishing seasons, my boat and permit will have little value when it is time to sell. This will also curtail new entrants into the fishery. Many of these operations are family-based, and some families may choose to quit a multi-generational way of life and move away from the community if they can no longer make a living.

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

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

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,

Ron Thomson
Cordova, Alaska
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Arthur Thurn, and I am a Southeast Alaska gillnetter with 46 years in the fishery. I fish aboard the F/V Skibo, and I live in Bellingham, Washington.

For 46 years, I have contributed 3 percent of my salmon earnings for hatchery production. Hatcheries give us fish to catch when wild stocks are weak, and they also give processors enough steady production to keep their workers busy. Worldwide production of salmon has driven prices way down, and we need hatcheries to stay in business. Hatcheries also help the charter fleet catch fish before coho show up. These proposals are a bad idea.

My friends who fish and live in Southeast Alaska could be driven into bankruptcy. Bankruptcy for processors and fishermen will occur if these proposals move forward.

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

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

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

Sincerely,

Arthur Thurn
Bellingham, Washington
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is David Thynes, and I am a lifelong commercial salmon fisherman based in Petersburg, Alaska. I operate the Fishing Vessel Nocona. I live in a community that directly depends on the commercial fishing industry and healthy Alaska salmon hatchery programs for community tax funding, employment, and the many peripheral industries that help support the commercial fishing industry in Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These three proposals would affect me directly by drastically reducing my commercial fishing viability due to limited hatchery production. These proposals are hip-shot attempts at an issue that is far more complex than the unvetted generalities they claim to address. Hatchery production in Southeast Alaska represents a large part of our commercial salmon opportunity. Without it, focus on wild stocks would certainly increase, presenting more management issues and probable further reduction of commercial opportunities to mitigate the additional added pressure on wild stocks.

In the last decade, our rural communities have seen incredible challenges in world markets reshape the fishing industry. The effects of this existing volatility will most certainly be exacerbated by these proposals. Our community will see reduced salmon landings fleet-wide due to reduced opportunity. This will logically lead to reduced processor production, which will reduce the need for personnel, which will trickle down to fewer jobs and probable population decrease without some other form of employment opportunity. A host of other negative economic effects in local businesses that support the commercial fishing industry will follow.

The direct risks I anticipate if these proposals succeed in reducing hatchery egg takes are by-products of the subsequent reduction in hatchery returns and the disregard of established science-based management policy. At risk is the evidence-based process we use to manage our salmon resources, as well as the stability of our commercial fishing related economies that keep many rural coastal communities and their businesses afloat, not to mention losing access to the sport fishing and personal use opportunities hatchery production has provided.

If we decide to make our resource decisions based on prejudiced hypotheses rooted in biased thinking rather than rely on well-vetted, unbiased scientific data gathered by a state agency tasked with the stewardship of our precious Alaskan salmon, we are turning a corner onto a path we may never recover from. If upheld, these proposals will be used as precedent-setting examples of how to manage Alaska's salmon that will undoubtedly harm this resource and all the businesses, entities, and individuals that have come to utilize it by opening the door to

supposition-based management, directly disregarding important data from ongoing Alaska hatchery research and the inclusive processes offered by our Regional Comprehensive Salmon Enhancement Plans.

To place blame specifically on Alaska's salmon hatchery programs for wild salmon stock declines without acknowledging the myriad other relevant quantifiable and unquantifiable oceanic and environmental factors is simply laughable. The world's scientific community has universally accepted that the earth is experiencing the effects of global warming. These effects alone present countless challenges to our biomes that manifest themselves in changes in habitats, changes in oceanic feed opportunities, changes in oceanic chemistry, and unprecedented changes in localized climate-driven weather, to name a few. Each of these carries a multitude of trickle-down effects influencing oceanic and riparian salmon habitats in Alaska. We need a much more holistic approach to addressing the complexities of declines in some of our Alaskan salmon stocks.

Hatcheries present a unique partnership in Alaska that offers a well-managed economic opportunity for our state. With a history of science-backed policy and transparency, our hatcheries help our coastal communities and their commercial fishing fleets, processors, and supporting industries remain viable and robust.

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

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

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

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

Sincerely,

David Thynes
AK

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Christine Tiedeman. I am a commercial fisherman from Cordova, Alaska, a Tribal member, and a subsistence user.

Proposals 170, 171, and 172 would threaten my income stability, job security, food security, and livelihood. The impacts would extend well beyond individual fishermen—reduced harvest opportunity would mean fewer processing jobs, less food availability, and ripple effects across local businesses and community stability.

I am also concerned that reducing hatchery production could contribute to the loss of certain runs over time, with trickle-down effects across communities and user groups. Canned pink salmon remains an important, affordable protein source for many families and communities, including in emergency food support systems.

Major decisions like this should be based on comprehensive data and careful analysis. Commercial fishing is a foundational pillar of Alaska’s economy and coastal way of life, and the Board should not move forward on broad reductions without demonstrated necessity.

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

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

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,

Christine Tiedeman
Cordova, Alaska
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Kanisha Tiedeman, and I am a mother, tribal member, subsistence user, local business owner, community member, and commercial fisherman in Cordova, Alaska. I operate K Lanae Tyee Fisheries and Quyanaa Heritage.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would affect our business, our access to fish, our family's livelihood, and our community. Implementing these proposals would result in reduced harvest opportunity, fewer jobs in our community, decreased economic stability, reduced food availability, impacts to tribal and cultural practices, and harm to local businesses.

These resources feed humans globally, and decreased access to harvest would have far-reaching consequences.

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

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

Sincerely,

Kanisha Tiedeman
Cordova, Alaska
[redacted]

Submitted by: Rose Tormohlen
Community of Residence: Wasilla

We want our waters closed to trawlers. The way locals are treated versus trawlers isnt right. We cant catch certain fish because numbers are low. But trawlers have millions of pounds of bycatch of the fish we get fined over. Conservation of oceans are important. I respect the laws. But when Alaskans cannot get their own food to survive, THAT is a problem. When we attack and punish the locals and not the trawlers causing the problems, that isnt right. Alaskans shouldn't have to worry about not getting food provided by the land and waters. These Trawlers rapebour oceans and we are the ones suffering. Today its Salmon and halibut. But look at the food chain. Whats next? Seal, bear. Orca, us. This needs to be stopped. Its inexcusable and dangerous. How bad does it have to be before you realize how dangerous trawlers are for our livelihood and planet? Please, let's stop them.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is John Tronrud, and I am a local sport and subsistence fisherman with over 50 years of experience in Skagway, Alaska and the Upper Lynn Canal in Southeast Alaska. I have volunteered with a small local science and education hatchery, served on the local advisory board, and watched declining fish size and stocks for years.

The fear that hatchery stocks will cause decline to native stocks is unfounded. Hatchery stocks have been said to be easier to catch commercially and by predation. Native stocks are declining due to pressure from improved catch methods and increased numbers of users across all user groups. If the Board is unwilling to look at improving stock runs and fish size, we are all in trouble.

I speak for myself as the family provider. Proposals 170, 171, and 172 will continue to degrade the total numbers of fish available for harvest. These proposals may not affect me directly today, but we have already been stopped from King salmon retention locally for sport fishermen, and I see the costs of catch and release by the average fisherman. Silver, sockeye, and chum could be next for subsistence.

Reduced harvests will affect local harvests and overall opportunity. A ripple effect of reduced fish for harvest will impact tribal, cultural, and subsistence needs for all. It will also create significant economic costs across all users, and the industry will crash if the total numbers of fish continue to decline.

Regional Comprehensive Salmon Enhancement is vital to all users. To change or stop current actions will destroy runs that currently exist. It is easy to point a finger, but change needs to be based on fact. All factors have cause and effect, and singling out any one user group is unrealistic. I do not understand why the Board objects to hatcheries. The only reason I can think of is political, and I hope that fear is not true.

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

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

Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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

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

Sincerely,

John Tronrud
SKAGWAY, ALASKA/ Upper Lynn Canal SE, Alaska
[redacted]

Submitted by: Michael Trotter
Baranof Wilderness Lodge & Beyond Boundaries Expeditions
Community of Residence: Sitka Alaska

Dear Alaska Board of Fish,

Thank you for the opportunity to comment on these proposals

Alaskans know that our future depends on healthy oceans. Our communities, local economies, and cultures are built on the abundance of marine life and the integrity of the habitats that sustain it. When those ecosystems are damaged, or when industrial fishing practices violate the spirit and letter of the law, we all lose. It is over due time to take control of the past and irreparable damage to our Alaskan oceans and ecosystems

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

Proposal 163 would redefine pelagic trawl gear as bottom trawl until operators can prove they are not fishing on the seafloor.

Proposal 164 would require seafloor monitoring technology on pelagic trawl nets to verify compliance with state regulations.

Proposal 165 would require the use of salmon excluders in pelagic trawl nets—a common-sense measure already standard in federal waters.

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

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

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

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

In Gracre & Respect

Mike Trotter

Baranof Wilderness Lodge

Beyond Boundaries Expeditions

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Nathan Tueller, and I am a commercial fisherman in Prince William Sound, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. The economic impact of these proposals cannot be overstated. Commercial fishermen rely on the hatcheries, and any reduction in their output comes directly at our expense. We continue to work with the hatcheries to reduce their operational costs, but those costs are basically fixed. Their operating expenses are paid first through the harvest of salmon they produce, called cost recovery. The remaining hatchery salmon are then available to the commercial salmon fishermen. Sometimes there are a lot, sometimes none. But overall, it is the last 10, 20, or 30 percent of the overall biomass produced by the hatcheries that we get to catch. Any reduction in output hits the fishermen directly — it comes out of our pockets. A 25 percent reduction would have the hatcheries operating, in many cases, just for their own expenses. It would eliminate the portion of their production that we, our families, our businesses, and our deckhands depend on.

This would not only affect the catchers and our deckhands, but our processors, their employees, their suppliers, and everyone downstream. It would have a devastating effect on the communities in my region.

I appreciate that some natural stocks are in decline, particularly kings. I think the hatcheries are exactly the thing that could help them if allowed. I do not believe our pinks and chums compete with kings in the ocean; if anything, they are probably food for those kings. I think on the Kenai, size-specific sports harvesting over the last 60 years or so, combined with tens of thousands of sport fishermen walking over the gravel where these eggs incubate, are more to blame. Statewide, trawler bycatch seems a much clearer smoking gun. Hatchery competition seems a long shot.

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

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

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

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

Sincerely,

Nathan Tueller
Prince William Sound, Alaska
[redacted]

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Abigail Turner, and I am a former commercial fisherman, current sport fisherman, and community member based in Soldotna, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. As an Alaskan and a neighbor to many who depend on stable fisheries and salmon harvest opportunities, these proposals would decrease opportunity and access to fish for my family, friends, and fellow Alaskans. They would negatively impact Alaska, not just coastal communities.

Hatchery-enhanced runs provide harvest opportunity and employment not just for commercial fishermen, but also stability for guides, the seafood processing sector, marine trades, and subsistence harvesters.

We know that marine conditions, weather, natural variation in salmon runs, and habitat degradation all contribute to future returns. Blaming anything on one particular factor is a dismissal of reality and evidence.

The constant barrage of anti-hatchery proposals is not about conservation. It is anti-small business. I would even venture to say that anti-hatchery proposals are anti-sport fishing, anti-guided angler, and anti-tourism industry. Instead of minimizing hatchery production or imposing moratoriums that are not based on science, we should be strategically enhancing runs that need help. Why not try rebuilding Chinook that way?

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

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

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

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Steve Tutt, and I have been an Alaska resident for 60 years. I am a commercial fisherman, sport fisherman, and fishing charter owner and operator based in Homer, Alaska. I operate the commercial fishing vessel Miss Grande and Homer King Fishing Charters, operating the vessels Redemption and Kings Ransom.

Our Prince William Sound salmon fishery would be nonviable financially without the hatchery programs that have supported four generations of my family. My family currently owns and operates five vessels in Prince William Sound salmon fisheries. A reduction in current hatchery production would create a cascade of financial failures affecting our livelihoods, our community support businesses, and our local sport and subsistence opportunities on the Homer Spit for salmon and across the bay for China Poot and Tutka Lagoon reds and pinks.

Hatchery-funded, science-based studies of fish and the ecosystems they use would cease, and ADF&G does not have funding to continue this much-needed research. Sport and subsistence fisheries used by thousands that are hatchery-created and supported in Prince William Sound and Cook Inlet would cease. The livelihoods of thousands of commercial fishing families, thousands of fish processing workers, and the companies that employ them would be massively impacted, if not eliminated. The economies of coastal communities that rely on sport, subsistence, and commercial fishing, and all the commerce that comes with it, would be financially devastated.

Any discerning user group of Alaska's resources would want the best and most thorough science and research to make wide-ranging reduction decisions on any resource. The fact that significant hatchery research beneficial for long-term planning and decision-making is in process should carry weight in delaying a decision of this magnitude.

We are undoubtedly in a battle for the health of a number of fisheries in our state and across the West Coast. As a collective group, including sport, subsistence, and commercial users, we must stand together, work together, and make the most informed decisions concerning our fishing future together. United, we will all be better off in the long run; divided, we will only inflict damage to one another and our collective opportunity and economy.

I grew up fishing with my dad in the pre-hatchery 1970s. Instability and complete shutdowns of commercial salmon fishing were the catalyst for development of hatcheries in Prince William Sound. My dad was involved with other fishermen in securing original brood and developing hatchery infrastructure at AFK with Armon Koenig. My family and I have continued to make a

living over the last 45+ years because of the predictable consistency hatcheries support. In Prince William Sound, we have seen over the long term a sustainable coexistence of both wild and hatchery stocks, and sport and subsistence users have come to depend on the stable supply of fishing opportunity as well.

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

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

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

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

Sincerely,

Steve Tutt
Homer, Alaska
[redacted]

Andrew A Umlauf
[redacted]
Shoreline WA 98133
[redacted]

March 1, 2026

Alaska Board of Fisheries
Statewide finfish and supplemental issues
March 17-21, 2026 meeting

RE: PROPOSAL 186, OPPOSE

I am a UCI drift gillnet permit holder and have participated in the fishery since 2012. I oppose proposal 186. It is a poorly written, highly allocative proposal with incorrect justifications. I am surprised to see it taken up as business at this meeting as **it does not meet the boards own criteria for an agenda change request or emergency and was voted down by most local advisory councils**. This alone is basis for 186 to be rejected. This proposal would have dire consequences for the drift fishery, UCI communities and the salmon resources of Cook Inlet as a whole, yet it has been taken up with little to no public input.

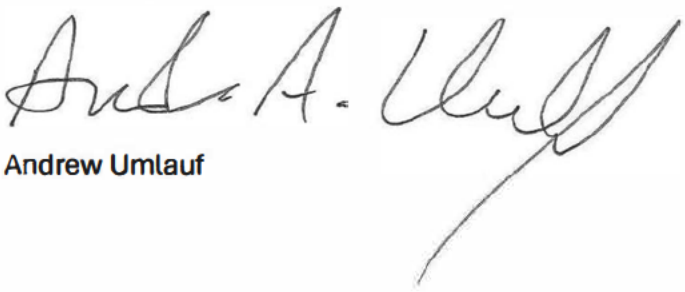
The Drift fleet is already restricted heavily in Federal and State waters for Coho conservation. When federal managers took over management of the EEZ, they copied the State's management plan and even restricted fishing further. The federal plan limits fishing in the second half of July to **one opener per week** and adds a catch limit/quota (TAC) for Coho, which is set at a very conservative 16,619 fish for the 2026 season. If this TAC is caught, the EEZ closes for the season to all commercial fishing. These restrictions are in place to allow Coho passage to northern district streams. Further restrictions to the drift fleet (proposal 186) are allocative, unfair and burdensome.

The proposal states that 200 fathoms of drift gear are allowed in the EEZ for all boats. This is not correct. 200 fathoms are allowed per federal rules in the EEZ, but State of Alaska rules prohibit having more than a legal compliment of gear on board in state waters. The only access to the EEZ is through State waters, making the gear allotment the same for both State or federal fishers, 150 fathoms of gear with one permit and vessels with two permits fishing 200 fathoms. **Participation has actually gone down in the EEZ since federal management has begun**. So, the idea that 186 assumes, more gear and effort are in place in the EEZ since federal management, is incorrect.

The Alaska department of fish and game currently has the flexibility needed to manage UCI salmon stocks. Proposal 186 is a blanket action that takes away this flexibility. It would remove fishing time without regard to coho run size, escapement or stock status. No northern district coho stocks are listed as a stock of concern to my knowledge. The proposal lists no clear conservation goal and nothing exists to tie restrictions to abundance, making it a purely allocative proposal.

With the utmost respect, I ask the board to reject proposal #186 in its entirety for the reasons I have outlined above. Failing this, I would ask the board to defer consideration until the regular BOF meeting for UCI in March 2027.

Respectfully,



Andrew Umlauf

Alaska Board of Fisheries
Alaska Department of Fish and Game
PO Box 115526 Juneau, AK 99811

Re: Proposals 11, 164 and 165

Chair Carlson Van Dort and Members of the Alaska Board of Fisheries:
The Under Sixty Cod Harvesters (USCH) is a member organization representing fixed gear vessels participating in the Pacific cod fisheries of the Bering Sea, Aleutian Islands, and Gulf of Alaska. Our members are longtime federal and statewater harvesters, and many of them operate in various other fisheries such as halibut, sablefish, crab and herring. We have regularly voiced our concerns around impacts of bottom contact by mobile gear, in both federal and state management processes.

We are writing in <u>support</u> of Proposals 11, 164 and 165.

Proposal 11 – Closed waters in the Bering Sea and Aleutian Islands: SUPPORT
USCH has commented frequently on the importance of protecting sensitive benthic habitats and crab populations, not only as foundational for crab species but also for other important groundfish species that rely on a healthy benthic ecosystem. It is reasonable to restrict bottom trawl activity in the proposed area, particularly considering the variable challenges that BSAI crab populations have experienced in recent years. Department comments demonstrate that less than 1% of the trawl harvest in this area occurs in state waters, while 12.6% of golden king crab harvest in this area occurs in state waters. These catch statistics, combined with the well established practice of protecting benthic habitat by limiting mobile bottom contact gear, demonstrates that this proposal would provide meaningful conservation and minimal harm.

Proposal 164 – Bottom Contact Monitoring for Pelagic Trawl Gear: SUPPORT
We focused on Proposal 164 rather than 163 because it provides a stronger route toward long-term success for the pelagic trawl fleet, whereas 163 may cause unnecessary fishing disruptions as compliance mechanisms are developed. We support the regulatory compliance principles inherent in both proposals.

State regulation defines pelagic trawl gear as gear that does not operate in contact with the seabed. That definition is explicit. However, ADF&G opposes Proposal 164, stating that the proposal is "unactionable" as written and that a state-water monitoring program may be cost prohibitive. While we respect the Department's concern regarding program design and cost, the existence of implementation challenges does not eliminate the underlying regulatory compliance issue. Nor do they leave you without an actionable path.

At its core, Proposal 164 presents a choice – whether to defer or affirm parameters for regulatory compliance. By deferring action in favor of status quo, the Board would leave this pivotal question unanswered: **does Alaska, and the Board of Fisheries, intend for pelagic trawl gear to operate in regular contact with the seafloor, or not?** Alaska's pelagic trawl fisheries are too large, and too important, for that question to remain unanswered. It can be addressed by the Board of Fisheries at this meeting, even if the Board is not supportive of immediate operational or enforcement changes.

We recommend that the Board take action to affirm the intent of the State gear definition, and then focus on a framework for development of regulatory tools that address the concerns cited in the proposal, through

consultation with industry participants and gear experts. In their comments, the Department recommended "coordinating efforts to address trawl effects across federal/parallel fisheries with the Council, NMFS, fishery stakeholders, and state/federal fisheries law enforcement agencies prior to adopting this proposal." We support that step as the right one for the Board to take at this meeting: affirm Alaska's gear definition and recommend an iterative, collaborative path for effective enforcement.

The Board retains the authority, and responsibility, to establish legal gear and management provisions in parallel fisheries. That authority exists precisely so the Board can address issues within state waters. **Taking no action would send several harmful messages about that authority:** that the Board is comfortable with the operational disparity between a gear definition and fishing practice; doesn't consider seafloor contact to be an important difference between bottom trawling and pelagic trawling; considers gear definition compliance to be widely flexible; and would prefer to defer to the federal process for defining legal gear and management provisions for trawling in state waters.

USCH urges the Board to affirm the pelagic trawl gear definition in relationship to bottom contact, and recommend an iterative course for developing workable, phased compliance mechanisms.

Proposal 165 – Salmon Excluders for Pelagic Trawl Gear: SUPPORT
Salmon excluders are well established technology used extensively in the Bering Sea to reduce salmon bycatch while continuing successful trawl operations. We recognize that there are concerns around cost and adaptation for smaller vessels. We are supportive of a phased approach to ensure excluders can be implemented thoughtfully and successfully.

USCH respectfully asks the Alaska Board of Fisheries to adopt Proposals 164 and 165 and direct a framework for practical, coordinated and phased implementation. Thank you for considering our comments.

Sincerely,

Hannah Heimbuch

Hannah Heimbuch, Director
Under Sixty Cod Harvesters

Submitted by Roland Maw
United Cook Inlet Drift Association

Proposal 186 Comments

Coho Escapements, History and Weir Locations in Northern Cook Inlet

1. Coho Escapement Goals (CEG)

   A. There are 4 coho rivers and creeks in the northern portion of Cook Inlet. The coho systems with CEG that are annually counted and managed are (See Table 1):

System	Escapement Goal
• Jim Creek	250 – 700
• Fish Creek	1,200 – 6,000
• Little Susitna	9,200 – 17,700
• Deshka River	10,200 – 24,100

   B. Please note the following:

   - Jim Creek:
     - missed the bottom end of the CEG 2 times in the last 10 years
     - missed the bottom end of the CEG 6 times in the last 29 years
     - exceeded the top end of the CEG 15 times in the last 29 years
     - was within the CEG 8 times in the last 29 years

   - Fish Creek:
     - missed the bottom end of the CEG 2 times in the last 10 years
     - missed the bottom end of the CEG 2 times in the last 29 years
     - exceeded the top end of the CEG 9 times in the last 29 years
     - was within the CEG 18 times in the last 29 years

   - Little Susitna:
     - missed the bottom end of the CEG 6 times in the last 10 years
     - missed the bottom end of the CEG 11 times in the last 29 years
     - exceeded the top end of the CEG 6 times in the last 29 years
     - was within the CEG 12 times in the last 29 years
     - **Incomplete CEG count 7 times in the last 10 years**
     - **There have been 4 different weir locations over the last 30 years (See Figure 1)**

   - Deshka River:
     - missed the bottom end of the CEG 7 times in the last 10 years
     - missed the bottom end of the CEG 12 times in the last 29 years
     - exceeded the top end of the CEG 8 times in the last 29 years
     - was within the CEG 9 times in the last 29 years
     - **Incomplete CEG count 7 times in the last 10 years**

C. Discussion

- Both the Little Susitna and Deshka Rivers have had incomplete coho weir counts for for 7 of the last 10 years.
- Both Jim Creek and Fish Creek have complete counts and do not have the weir problems of the either the Little Susitna or the Deshka River.
- Given the incomplete counts and problems with the Little Susitna and Deshka River weirs, it is impossible to use these 2 systems as indexes for the rest of the 1,200 coho streams in Upper Cook Inlet.

Figure 1.–The Little Susitna River drainage showing weir locations (arrows).

Figure 1 taken from ADF&G Fishery Data Series 20-03.

Table 1. History of Coho Escapements, 1997 - 2025				
Year	Jim Creek	Fish Creek	Little Su	Deshka
Esc Goal	250 - 700	1,200 - 6,000	9,200 - 17,700	10,200 - 24,100
1997	701	3,437[b]	9,894	8,063
1998	922	5,463[b]	15,159	6,773
1999	12	1,766[b]	3,017	4,563
2000	657	5,218[b]	15,436	26,297
2001	1,019	9,247[b]	30,383	29,915
2002	2,473	14,651[b]	47,938	24,612
2003	1,421	1,231[b]	10,877	17,305
2004	4,652	1,415	40,199	62,940
2005	1,464	3,011	16,839	47,887
2006	2,389	4,967	8,786	59,419
2007	725	6,868	17,573	10,575
2008	1,890	4,868	18,485	12,724
2009	1,331	8,214[b]	9,523	27,348
2010	242	6,977[b]	9,182	10,390
2011	261	1,428	4,826	7,508
2012	213	1,237[b]	6,770	6,825
2013	663	7,593[b]	13,583	22,141
2014	122	10,283[b]	24,211	11,578
2015	571	7,912[b]	12,421	10,775
2016	106	2,484	9,998	6,816
2017	607	8,966[b]	17,781	36,869
2018	758	5,022[b]	7,583[c]	12,933[c]
2019	162	3,025	4,226[c]	10,445
2020	735	4,555	10,765[c]	5,368[c]
2021	1,499	NS[a]	10,923[c]	3,338[c]
2022	1,899	3,137[c]	3,162[c]	3,168[c]
2023	378	1,534	3,726[c]	1,817[c]
2024	376	235[c]	964[c]	642[c]
2025	450	3,398	4,506[c]	3,869[c]
above range	15	9	6	8
in range	8	18	12	9
below range	6	2	11	12

a. Escapement not surveyed or monitored during years with No Survey (NS).

b. Calculation of percentiles based on escapements in 1969, 1972–1976, 1978, 1997–2003, 2009–2010, 2012–2015, 2017–2018; these were years with no stocking and for which the weir was operated past September 1. Escapements for 1969, 1972–1976 and 1997, were expanded by 25% to account for removal of weir from September 1 to 17. In 1977, the weir was removed in August, and 1979–1996 were excluded because stocked fish returned.

c. Incomplete counts. Weir washed out or not operated.

UNITED FISHERMEN OF ALASKA

Mailing Address: [redacted] Juneau AK 99802-0229
Phone: [redacted]
E-mail: [redacted] Website: www.ufa-fish.org

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

March 1, 2026

RE: Board of Fish Proposal 11

Dear Chair Carlson-Van Dort:

The United Fishermen of Alaska (UFA), the statewide commercial fishing trade association representing 35 organizations and thousands of individual fishermen, submits these comments on Proposal 11. UFA represents the full diversity of Alaska's commercial fishing fleet, from small family-owned vessels to large catcher-processors, and our mission is to support the long-term sustainability and economic viability of all Alaska commercial fisheries. Throughout its history, UFA has encouraged following established science-based management processes. Alaska's fisheries are managed through rigorous public processes supported by extensive scientific analysis. UFA is concerned that Proposal 11 lacks adequate information and adoption by the Board of Fisheries (the Board) may set a troubling precedent that could threaten science-based management of other sustainable fisheries across Alaska.

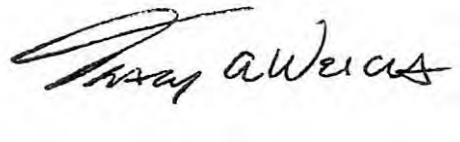
In general, UFA is opposed to the Board placing a ban on *ANY* specific commercial fishing gear types. In this case, UFA is concerned about the Board supporting Proposal 11 without clear identification of the problem Proposal 11 attempts to solve. UFA encourages the Board to distinguish and consider known trawl habitat impacts in the area as noted by best available science versus theoretical impacts. As the Board is aware, extensive habitat protections are already in place throughout the Aleutian Islands region which were created by NOAA fisheries nearly 20 years ago. These actions closed over 95% of the Aleutian Island management area to trawling (see attachment 1). The areas that remain open support important federal and state-managed trawl fisheries and were specifically designed to benefit smaller vessels and local communities in the Aleutian Islands region.

We emphasize the importance of fully understanding what species are targeted by the trawl fleet in the area and whether adequate fishing opportunities for those species exist for the trawl fleet outside the targeted area – especially for under-58 foot vessels in the State water fishery. UFA encourages the Board to carefully review the extensive size of the proposed closure and whether increased communications and voluntary collaboration between fleets within a targeted sub-area could address stakeholder concerns. Importantly, existing trawl fisheries in these areas have

demonstrated extremely low bycatch of golden king crab and shifting effort outside of open areas could increase bycatch and habitat impacts for this species.

UFA appreciates the Board's consideration of our concerns and further recommends that the Board encourage concerned stakeholders in this area to seek non – regulatory resolution amongst one another to address remaining issues.

Regards,



Matt Alward
President

Tracy Welch
Executive Director

MEMBER ORGANIZATIONS
Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Ekuk Beach Fishermen's Association • Freezer Longline Coalition • Fishing Vessel Owners Assn • Groundfish Forum
Kodiak Regional Aquaculture Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture
Association • Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance
Southeast Alaska Fisherman's Alliance • Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional
Aquaculture Association • United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association

CCC ABM Report #

NP1

Aleutian Islands Habitat Conservation Area

PC481
275,909 nm^2

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	*Habitat*	*BSAI GF FMP Am 78*	*February 2005*	*March 22, 2006 71 FR 14470*	*June 28, 2006 71 FR 36694*	*July 28, 2006*
		BSAI GF FMP 88	*March 2007*	*Nov. 21, 2007 72 FR 655539*	*Feb. 19, 2008 73 FR 9035*	*March 20, 2008*

Purpose and Need

The 1996 amendments to the Magnuson-Stevens Act (MSA) require NMFS and regional Fishery Management Councils to describe and implement essential fish habitat (EFH) within FMPs and minimize, to the extent practicable adverse effects on EFH caused by fishing and identify other actions to encourage the conservation and enhancement of EFH. EFH is defined in the MSA as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity."

The Aleutian Islands Habitat Conservation Area (AIHCA) was adopted as part of a suite of conservation measures to minimize the adverse effects of bottom contact fishing in the Aleutian Islands subarea. After the AIHCA was established, fishery participants identified two changes necessary to fulfill the intent of the AIHCA while allowing fishing in areas that had historically been fished. The Council responded by closing additional waters near Buldir Island and opening waters near Agattu island to nonpelagic trawl gear under BSAI GF FMP Amendment 88.

Prohibitions

- Non-pelagic trawl gear

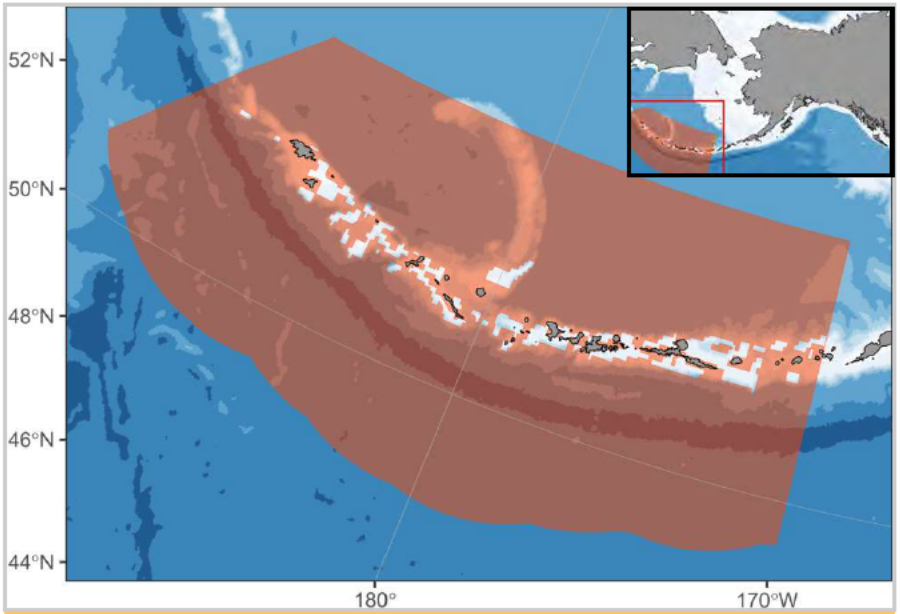
Analysis

NMFS and the Council published a draft EIS for Amendment 78 in January 2004 evaluating 3 actions: Describing and identifying EFH, adopting an approach to identify HAPCs, and Minimizing to the extent practicable the adverse effects of fishing on EFH. The preferred alternative for HAPCs was to adopt a site-based approach for HAPC designations.

A 74 page EA/RIR/FRFA was prepared for Amendment 88. The two alternatives evaluated were no action and modifying the latitude and longitude definitions for open areas in the AIHCA, changing the boundaries in areas north of Agattu Island and north of Buldir Island. Alternative 2 was determined to have no significant environmental impacts and would provide socioeconomic benefits through opening a portion of the AIHCA to fishing.

Regulation Summary

No federally permitted vessel may fish with nonpelagic trawl gear in the Aleutian Islands Habitat Conservation Area. Vessel monitoring system is required for all fishing vessels.



The Aleutian Islands Habitat Conservation Area

Conservation Value

Beginning in 2006, over 95% of the Aleutian Islands management area was closed to bottom trawling (950,463 km^2 or 277,100 nnm^2), and about 4% (42,611 km^2 or 12,423 nm^2) remain open.

This area establishes comprehensive protection for coral and sponge ecosystems, which occur at high densities along the Aleutian Islands and deep water basin/trench areas. Deep sea corals grow very slowly and damage to these corals can take hundreds of years to recover. The habitat created by deep sea coral and sponges provides spawning grounds for species such as rockfish and crabs.

In addition to protecting vulnerable deep-sea corals, sponges and other epifauna from potential impacts of fishing, the prohibition on nonpelagic trawl gear also prevents impacts to the undisturbed sediments and ecosystems of the deeper basin and trench areas.

CCC ABM Report #

NP3

Bowers Ridge Habitat Conservation Zone

PC481
5,284 nm^2

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	*Habitat*	*BSAI GF FMP Am 78*	*February 2005*	*March 22, 2006 71 FR 14470*	*June 28, 2006 71 FR 36694*	*July 28, 2006*

Purpose and Need

The 1996 amendments to the Magnuson-Stevens Act require NMFS and regional Fishery Management Councils to describe and implement essential fish habitat (EFH) within FMPs and minimize, to the extent practicable adverse effects on EFH caused by fishing and identify other actions to encourage the conservation and enhancement of EFH. EFH is defined in the Magnuson-Stevens Act as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. The Bowers Ridge Habitat Conservation Zone was recognized as likely to contain high densities of coral and sponge habitat, prompting the Council to close the area to all bottom contact fishing gears.

Analysis

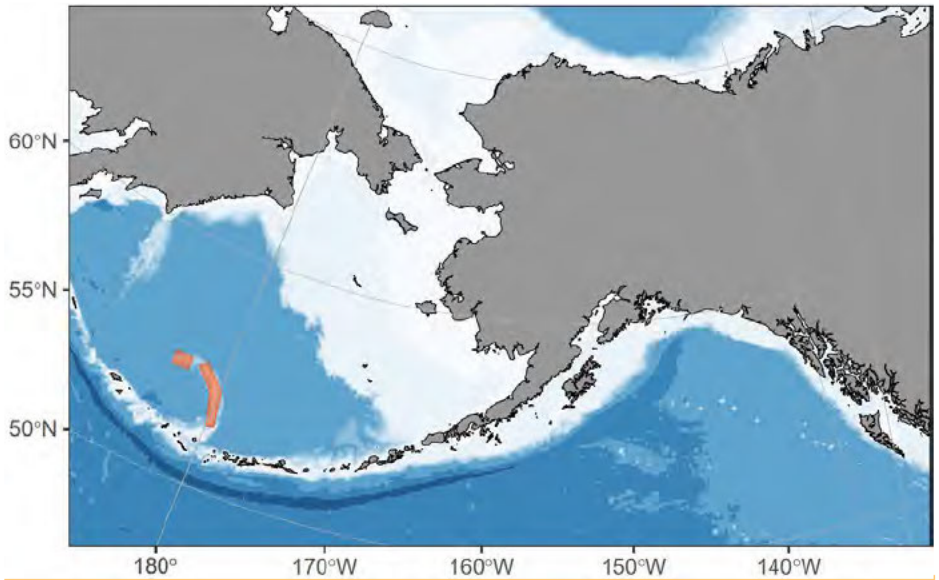
NMFS and the Council published a draft EIS in January 2004 evaluating 3 actions: Describing and identifying EFH, adopting an approach to identify HAPCs, and Minimizing to the extent practicable the adverse effects of fishing on EFH. The preferred alternative was to establish numerous closures to traw and bottom contact gear to minimize adverse effects of fishing on EFH.

Regulation Summary

No federally permitted vessel may fish with mobile bottom contact gear, including dredges, non-pelagic trawl, and dinglebar gear, in the Bowers Ridge Habitat Conservation Zone.

Prohibitions

- Mobile bottom contact gear, including:
  - Dredge
  - Nonpelagic trawl
  - Dinglebar



The Bowers Ridge Habitat Conservation Zone

Conservation Value

As a precautionary measure, the Council voted to prohibit mobile fishing gear that contacts the bottom (i.e. dredges, nonpelagic trawls, and dinglebar gear) within this 18,131 km^2 (5,286 nm^2) area.

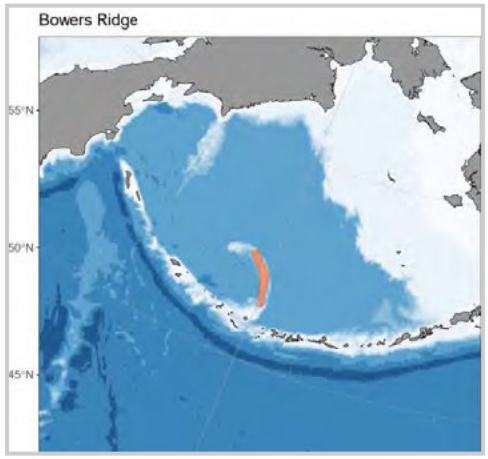
While Bower's ridge is relatively unexplored, it is likely to provide habitat for cold-water corals and sponges, as well as fish and crab species.

These area establish nearly full protection for the underwater ridge ecosystems north of the Aleutian Islands. Gear prohibitions in these areas was determined to have the greatest positive effects on biodiversity in the area, as they prevent impacts to the undisturbed sediments and ecosystems in these relatively intact and undisturbed ecosystems.

Sub Areas

The Bowers Ridge Habitat Conservation Zone is comprised of two separate areas:

- Bowers Ridge (3,937 nm^2)
- Ulm Plateau (1,347 nm^2)



CCC ABM Report #

NP16

Aleutian Islands Coral Habitat Protection Areas

PC481
111 nm^2

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	*Biodiversity & Vulnerable Ecosystems*	*BSAI GF FMP Am 65/78*	*February 2005*	*March 22, 2006 71 FR 14470*	*June 28, 2006 71 FR 36694*	*July 28, 2006*

Purpose and Need

Council evaluated BSAI FMP Amendments 65 and 78, designating areas as Habitats of Particular Concern (HAPC) to highlight research areas and protect fragile coral habitats.

The 1996 amendments to the Magnuson-Stevens Act require NMFS and regional Fishery Management Councils to describe and implement essential fish habitat (EFH) within FMPs and minimize, to the extent practicable adverse effects on EFH caused by fishing and identify other actions to encourage the conservation and enhancement of EFH. EFH is defined in the Magnuson-Stevens Act as "those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity." Habitat Areas of Particular Concern (HAPC) are those areas of EFH that are particularly important as fish habitat, or are particularly vulnerable to depredation.

Submersible observations identified high densities of corals and sponges in the Aleutian Islands area. The Council voted to protect these "coral garden" areas and develop a comprehensive plan for research and monitoring to improve scientific information about this area and evaluate the effectiveness of fishery management measures to protect this habitat.

Analysis

NMFS and the Council published a draft EIS in January 2004 for GOA FMP Amendments 65/73 and BSAI FMP Amendments 65/78 evaluating 3 actions: Describing and identifying EFH, adopting an approach to identify HAPCs, and Minimizing to the extent practicable the adverse effects of fishing on EFH. The preferred alternative for HAPCs was to adopt a site-based approach for HAPC designations.

In addition to the Aleutian Islands Coral Habitat Protection Areas, other HAPC sites in Amendments 65 and 73 included HAPCs for Seamounts in the EEZ and corals in the Gulf of Alaska.

Regulation Summary

No federally permitted vessel may fish with mobile bottom contact gear in the Aleutian Islands Coral Habitat Protected Areas.

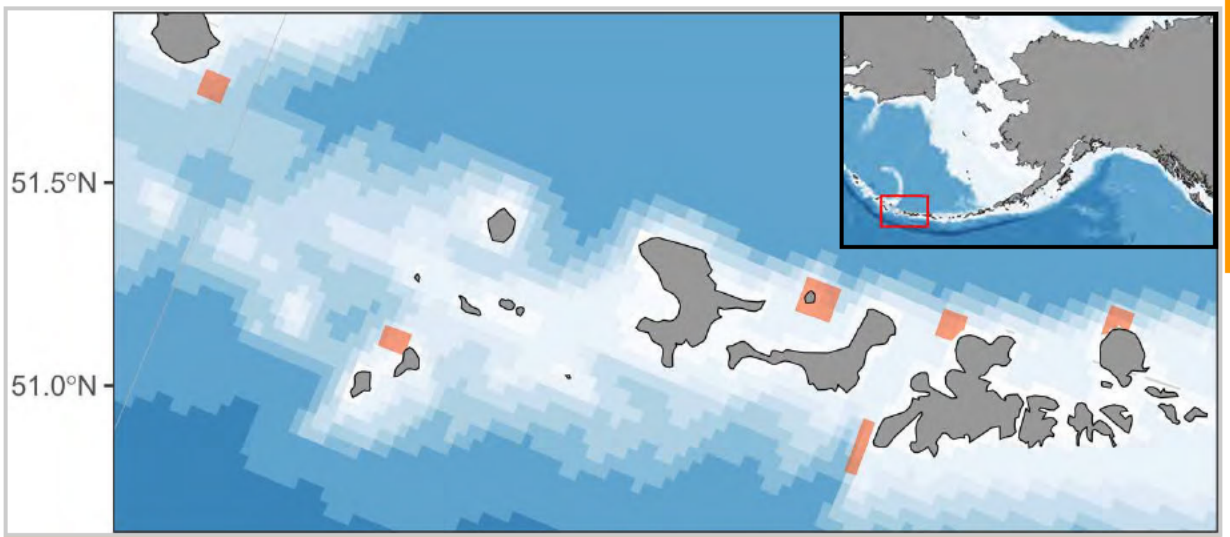
Beginning in 2006, these areas were closed to all bottom contact fishing gear (longlines, pots, trawls, etc.) and cover a total area of 377.3 km^2 (110 nm^2). To improve monitoring and enforcement of the Aleutian Island closures, a vessel monitoring system (VMS) was required for all fishing vessels. Additionally, a comprehensive plan for research and monitoring will be developed to improve scientific information about this area, and improve and evaluate effectiveness of these fishery management measures.

Conservation Value

These areas provide protection of these undisturbed coral and sponge areas in the Aleutian Islands from potential impacts of fishing gear. Deepsea coral habitats provide breeding areas, refuge and rich feeding grounds for a wide variety of species. These six sites with especially high densities of corals and sponges (the so-called "coral garden" areas) were delineated based on submersible observations. Deep sea corals grow very slowly and can be thousands of years old. Damage to these corals can take hundreds of years to recover. The habitat created by deep sea coral and sponges provides spawning grounds for species such as rockfish and crabs.

Prohibitions

- All bottom contact gear:
  - Nonpelagic trawl
  - Dredge
  - Dinglebar
  - Pot
  - Hook and line



The Aleutian Islands Coral Habitat Protection Areas

CCC ABM Report #

NP18

Steller Sea Lion Protection Areas-Aleutian Islands Subarea

PC481
18,806 nm^2

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	*Vulnerable Species*	*BSAI GF FMP Am 70*	*October 2001*	*Jan. 8, 2002 67 FR 956*	*May 16, 2002 67 FR 34860*	*Implemented Through Regulations*

Purpose and Need

In 1990, NMFS designated Steller sea lions as a threatened species under the ESA. The designation followed severe declines throughout much of the GOA and Aleutian Islands region. In 1993, NMFS designated critical habitat for the species, including the marine areas within 20 nautical miles (nm) of major rookeries and haulouts west of 144° W longitude (long.) and three large aquatic foraging areas.

In the 2001, NMFS recognized that the decline of the species was likely due to multiple factors including environmental changes such as El Nino and the Pacific Decadal Oscillation, predation, subsistence harvests, incidental take in fisheries, and competition for prey resources with pollock, Pacific cod, and Atka mackerel fisheries. This last issue, competition with fisheries, is addressed by this action.

On November 30, 2000, NMFS issued a biological opinion on the Groundfish FMPs, which determined that the pollock, Pacific cod, and Atka mackerel fisheries were likely to jeopardize the continued existence of the western DPS of Steller sea lions and to adversely modify its critical habitat. This opinion contained a reasonable and prudent alternative (RPA) including large fishery closure areas, harvest limits, and seasonal harvest distribution for pollock, Pacific cod, and Atka mackerel fisheries. Before the RPA could be implemented, President Clinton signed Public Law 106–554 on December 21, 2000, which contained a 1–year timetable to phase in the RPA. This year provided the Council with time to develop alternative protection measures that would avoid jeopardy and adverse modification of critical habitat for Steller sea lions

Steller Sea Lions at Cape Izigan, Unalaska Island

NMFS issued a final rule to implement Steller sea lion protection measures to avoid the likelihood that the groundfish fisheries off Alaska would jeopardize the continued existence of the western DPS of Steller sea lions or adversely modify its critical habitat. These management measures disperse fishing effort over time and area to provide protection from potential competition for important Steller sea lion prey species in waters adjacent to rookeries and important haulouts. The intended effect of this final rule was to protect the endangered western DPS of Steller sea lions, as required under the Endangered Species Act (ESA), and to conserve and manage the groundfish resources in the Bering Sea/Aleutian Islands management area (BSAI) and the Gulf of Alaska (GOA) in accordance with the Magnuson-Stevens Fishery Conservation and Management Act.

Analysis

A 2,227 page SEIS (dated November 2001) was prepared for Steller Sea Lion Protection Measures in the Federal Groundfish Fisheries Off Alaska. Five alternatives were evaluated: no action allowing regulatory measures designed to protect Steller sea lions to expire, a low and slow approach establishing lower TACs and implementing measures to spread catches throughout the year, a restricted and closed area approach establishing large areas of critical habitat where fishing is prohibited and restricting catch in remaining critical habitat, an area and fishery specific approach allowing different management measures in three areas (AI, BS, and GOA) including fishery specific closed areas around rookeries and haulouts with seasons and catch apportionments (preferred alternative), and a critical habitat and catch limit approach with seasonal apportionments and harvest limits within critical habitat in proportion with estimated fish biomass. Alternative four had 3 options: a small boat exemption in Chignik, a small boat exemption in Unalaska, and gear specific zones for GOA Pacific cod fisheries.

Regulation Summary

There are site-specific regulations that prohibit fishing for pollock, Pacific cod, or Atka mackerel by different gear types from 3 nm, 10, nm, and 20 nm around the Steller sea lion rookery or haulout area. The harvest of these prey species for Steller sea lions in these areas was evaluated, and specific fisheries were prohibited to reduce the potential of competition for prey. At some sites, there may be minor fishing effort rockfish, sablefish, and halibut. While not prohibited outside of 3 nm, there are no recreational fisheries in these areas.

Conservation Value

The rookery and haulout areas in the Aleutian Islands Subarea are designated as critical habitat for Steller sea lions and the regulations protect sea lions from any potential competition with fisheries for prey.

In addition to mitigating potential effects of fishing on Steller sea lions, the MPA's also offer localized protection to deep-sea coral and sponge communities along the Aleutian Islands. Submersible observations have found areas with complex coral and sponge communities within the areas encompassed by the MPA's, although the absolute amount of protection to this habitat has not been quantified.

Steller Sea Lion Protection Areas-Aleutian Islands Subarea (continued)

Type:	Focus:	Related FMP Amendment	Council Action	Proposed Rule	Final Regulations	Effective
Ecosystem Conservation	*Vulnerable Species*	*BSAI GF FMP Am 70*	*October 2001*	*Jan. 8, 2002 67 FR 956*	*May 16, 2002 67 FR 34860*	*Implemented Through Regulations*

Sub Areas

Yunaska Island

Directed fishing for pollock and trawling for Pacific cod is prohibited within 10 nm of rookery/haulout area; use of hook and line and pots for Pacific cod within 20 nm; within 20 nm for Atka mackerel.

Bumpy Point

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; and for Atka mackerel 3/20 nm depending on area.

Seguam Island South Side

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; use of hook and line and pots for Pacific cod within 20 nm; within 12 nm for Atka mackerel.

Amlia Island East, Tanadak Island (Amlia), Finch Point, Amuka Island & Rocks, and Chugulak Island

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; use of hook and line and pots for Pacific cod within 20 nm; within 20 nm for Atka mackerel.

Bobrof Island, Kanaga Island North Cape, Little Kanaga Strait, Great Sitkin Island, Anagaksik Island, North Cape, Amilia Island Sviech Harbor, and Sagigik Island

Directed fishing for pollock and trawling for Pacific cod is prohibited within 3 nm of rookery/haulout area; within 20 nm for Atka mackerel

Agligadak Island and Saddleridge Point

Directed fishing for pollock prohibited within 10 nm of rookery/haulout area; all fishing for Pacific cod within 20 nm; within 20 nm for Atka mackerel.

Ship Rock, Adak Island, and Kasatochi Island

Directed fishing for pollock prohibited within 10 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots; within 20 nm for Atka mackerel

Alaid Island, Shemya Island, Sobaka & Vega, and Chirikof Point

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area, and 3 nm for Atka mackerel.

Krysi Point, Cape St. Stephan, and Cape Ivan

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area; and 20 nm for Atka mackerel

Sirius Point, Tanadak Island (Kiska), Nitrof Point, Unalga & Dinkum Rocks, and Kavalga Island

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area; and 3 nm for Atka mackerel.

Ugidak Island and Segula Island

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area, trawling for Pacific cod is prohibited within 3nm of area; and for Atka mackerel 3/20 m depending on area.

Buldir Island

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; Pacific cod fishing is prohibited within 10 nm for all gears, and 10 nm for Atka mackerel.

Cape St. Stephan, Cape Wrangell, Gillon Point, Cape Sabak, Leif Cove, and Hasgox Point

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots, and 10 nm for Atka mackerel.

Tag Island and Gramp Rock

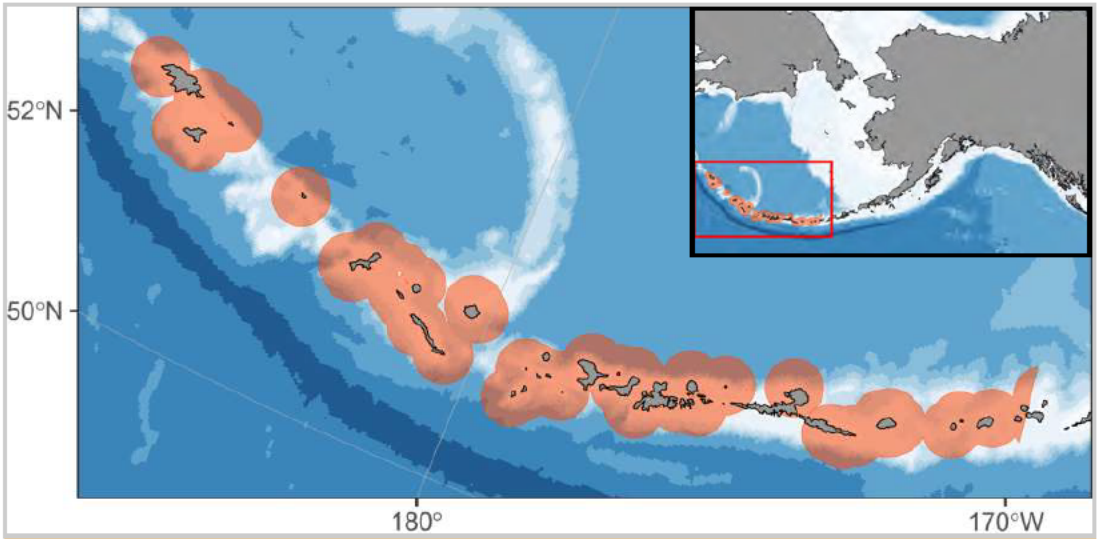
Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots; and 10/20 nm for Atka mackerel depending on area.

Ayugadak Point, Column Rocks, East Cape, Petrel Point and Pochnoi Point

Directed fishing for pollock prohibited within 20 nm of rookery/haulout area; within 10 nm for Pacific cod trawls and within 3 nm for hook and line and pots; and 20 nm for Atka mackerel.

Prohibitions

* Prohibitions vary by site, but may include prohibitions on directed fishing for pollock, Pacific cod, or Atka mackerel, out to specified distances from the haulout or rookery.



Sea Lion Protection Areas in the Aleutian Islands Subarea

UNITED FISHERMEN OF ALASKA

Mailing Address: [redacted] Juneau AK 99802-0229
Phone: [redacted]
E-mail: [redacted] **Website:** www.ufa-fish.org

March 1, 2026

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

RE: Opposition to Proposals 163 & 164 – 5 AAC 39.105, Types of Legal Gear

Dear Chair and Members of the Board,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state and in federal waters off Alaska's coast. UFA submits the following comments in opposition to Proposals 163 and 164.

UFA supports compliance with existing Alaska statutes and regulations governing trawl gear, including the current definition of pelagic trawl gear in 5 AAC 39.105 and its prohibition on seafloor contact. Maintaining clear, enforceable standards that protect marine habitat while allowing lawful fisheries to operate is fundamental to Alaska's fisheries management framework. However, Proposals 163 and 164 would establish a new presumption that all trawl gear operated in state waters is bottom-contact gear unless operators can affirmatively prove otherwise through Department-approved monitoring technology. As drafted, these proposals would impose a compliance standard that is not currently feasible to meet in a consistent, reliable, and enforceable manner.

Proposal 163 would require the Department to create a verification system for "midwater status" and to define acceptable proof of no seafloor contact. Proposal 164 would mandate the installation of Department-approved seafloor contact detection systems capable of real-time or near-real-time verification. While the intent of improving accountability is understandable, the technology necessary to conclusively verify the absence of any bottom contact under all operating conditions is not yet sufficiently developed, standardized, or field-tested for universal application in Alaska state waters.

UFA recognizes that questions regarding gear behavior, enforcement consistency, and evolving monitoring technologies merit continued evaluation. We support collaborative efforts among industry, the Department, and enforcement agencies to assess the feasibility, reliability, and cost implications of emerging monitoring tools before mandatory standards are adopted.

In addition, vessel configuration varies widely across the fleet. For some operators, particularly smaller platforms, retrofitting vessels with sophisticated sensor arrays and electronic monitoring

systems may not be physically or economically practical. The result could be the unintended exclusion of otherwise lawful participants based not on demonstrated violations, but on their inability to meet a technologically complex and evolving standard.

These proposals would also require the Alaska Department of Fish and Game to design, approve, implement, and enforce a new monitoring and compliance framework. Such a program would carry significant administrative and fiscal implications. At present, no comprehensive structure exists within state management to support the development, calibration, data management, and enforcement oversight contemplated in these proposals.

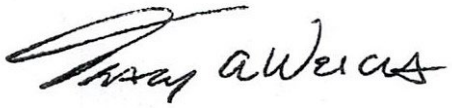
Alaska's fisheries are already subject to extensive state and federal management, habitat protections, and Essential Fish Habitat assessments in both the Bering Sea and the Gulf of Alaska. Any additional regulatory framework should be science-based, enforceable, economically practical, and implemented only when the necessary technical and administrative systems are demonstrably capable of achieving their intended purpose.

We respectfully urge the Board to reject Proposals 163 and 164 as drafted.

UFA remains committed to working collaboratively with the Board, the Department, and stakeholders to ensure Alaska's fisheries continue to operate sustainably, responsibly, and in compliance with established law.

Thank you for your consideration.

Regards,



Matt Alward
President

Tracy Welch
Executive Director

MEMBER ORGANIZATIONS
Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel Owners Assn Groundfish Forum • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel
Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association
United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association

UNITED FISHERMEN OF ALASKA

Mailing Address: [redacted] Juneau AK 99802-0229
Phone: [redacted]
E-mail: [redacted] Website: www.ufa-fish.org

March 1, 2026

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

RE: UFA's Opposition to Proposals 167, 168, 186, 187 and Support of Proposal 169

Dear Chair and Members of the Board,

United Fishermen of Alaska (UFA) is the statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state and in federal waters off Alaska's coast. UFA submits the following comments:

Proposals 167 and 168 - Oppose

UFA Opposes proposals 167 and 168. UFA recognizes that there may have been issues around gear type used in the commercial Pacific Cod jig fishery around Kodiak, but do not support such substantial changes to Statewide regulations to solve a regional issue. While it may fix issues and increase enforcement's abilities in one region of the State, it would cause operational harm to commercial fishermen in other regions of the State that are not seeing similar issues.

Proposal 169 - Support

UFA supports proposal 169. 169 would create a definition of the relatively new gear type commonly referred to as "slinky pots." Slinky pots are listed as a legal gear type for many groundfish fisheries throughout the State, but the gear type is not yet defined. This proposal will close the gap and provide a definition for an already legally and widely utilized gear type.

Proposal 186 - Oppose

UFA opposes proposal 186. UFA opposed the adoption of this proposal as ACR 5 in the October 2025 Work Session and maintain our opposition to this as proposal 186. UFA has a longstanding opposition to actions before the Board of Fisheries that would reduce or restrict commercial fishing activity in the State of Alaska when there is no biological or ecological necessity. This proposal has the potential to significantly reduce both time and area for the Cook Inlet drift fishery. The main driver of this proposal is coho escapement in Upper Cook Inlet river systems,

which have been experiencing weather and funding related issues at the weir sites used for tallying coho escapement. UFA believes that the best course of action is to instead focus on getting proper enumeration of coho in Upper Cook Inlet rivers to establish if their is escapement concerns before deciding whether or not to close down a fishery that is just getting back on its feet.

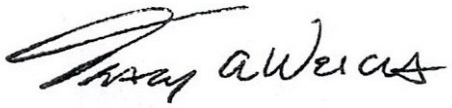
Proposal 187 - Oppose

UFA opposes proposal 187. UFA opposed the adoption of this proposal as ACR 8 in the October 2025 Work Session and maintain our opposition to it as proposal 187. UFA has a longstanding opposition to actions before the Board of Fisheries that would reduce or restrict commercial fishing activity in the State of Alaska when there is no biological or ecological necessity. There is very little commercial harvest on the Tsiu or Kaliakh Rivers annually, due to high cost of operating in the area and the Department has not expressed concerns with managing for both commercial and sport fishing in the geologically dynamic Yakataga Management Area. This proposal would take away Department tools that allow them to adapt annually through in season E.O. management and annually adjustable markers. Due to the geologically dynamic nature of the region, the Yakataga Management Plan gives the Department the authority to move the commercial set net regulatory boundaries based on the annual movement of the Tsiu and Kaliakh Rivers. It is also noted that while a winter storm merged the mouths of the Tsiu and Kaliakh, it is not unlikely that future storms could again shift the two river's outflows.

UFA remains committed to working collaboratively with the Board, the Department, and stakeholders to ensure Alaska's fisheries continue to operate sustainably, responsibly, and in compliance with established law.

Thank you for your consideration.

Matt Alward
President



Tracy Welch
Executive Director

MEMBER ORGANIZATIONS
Alaska Bering Sea Crabbers • Alaska Longline Fishermen's Association • Alaska Scallop Association • Alaska Whitefish Trawlers Association
Area M Seiners Association • At-sea Processors Association • Bristol Bay Regional Seafood Development Association • Bristol Bay Reserve
Cape Barnabas, Inc. • Concerned Area "M" Fishermen • Cook Inlet Aquaculture Association • Cordova District Fishermen United
Douglas Island Pink and Chum • Freezer Longline Coalition • Fishing Vessel Owners Assn Groundfish Forum • Kodiak Regional Aquaculture
Association • Kodiak Seiners Association • North Pacific Fisheries Association • Northern Southeast Regional Aquaculture Association
Northwest Setnetters Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation • Purse Seine Vessel
Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Conservation Alliance • Southeast Alaska Fisherman's Alliance
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners • Southern Southeast Regional Aquaculture Association
United Catcher Boats • United Southeast Alaska Gillnetters • Valdez Fisheries Development Association

UNITED FISHERMEN OF ALASKA

Mailing Address: [redacted] Juneau AK 99802-0229
Phone: [redacted]
E-mail: [redacted] Website: www.ufa-fish.org

Alaska Board of Fisheries
Board Support Section
Attn: BOF Comments
PO Box 115526
Juneau, AK 99877-5526

RE: Opposition for proposals 170,171 and 172

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

United Fishermen of Alaska (UFA) is a statewide commercial fishing trade association representing 35 commercial fishing organizations participating in fisheries throughout the state, and the federal fisheries off Alaska's coast. UFA has taken positions of the following proposals for the March 17-20th Statewide Finfish and Supplemental Issues, Board of Fish meeting:

Proposal # 170: OPPOSE

UFA is opposed to proposal 170. UFA opposes proposals that seek to reduce hatchery production and has opposed this proposal in all of its previous forms since introduced as an ACR 2 in 2018. Proposal 170 is another attempt to simply re-order the words of proposal 156, rejected (2/5) and proposal 78, rejected (1/5) during the 2024/2025 board cycle in Southeast and Prince William Sound. This proposal fails to consider the economic impacts a 25% reduction in pink and chum production would have on all statewide salmon harvesters. Hatcheries produce nearly 1/4 of Alaska's salmon harvest, generate up to 4200 jobs and create an economic impact of approximately $576M annually[1]. A reduction of this magnitude will have dire impacts to commercial fisheries, seafood processing industries and coastal communities around the state and create cascading impacts to the viability of other hatchery programs, which will support sport, and other noncommercial harvesters. The proposer provides no new conclusive scientific evidence to link any negative effect of hatchery production to the health or abundance of other wild salmon stocks.

Proposal #171: OPPOSE

UFA is opposed to proposal 171. Again, UFA is opposed to proposals that seek to reduce hatchery production. Proposal 171 requests changes to PWS hatchery production sufficient to reduce straying to achieve a 2% stray rate as stated in the 1995 *PWS/Copper River Comprehensive Salmon Management Plan.* The 2% stray rate is exclusive to the PWS plan, is not incorporated into any other regional salmon management plan and the

[1] Economic Impacts of Alaska hatcheries – McKinley Research Group 2024

threshold for straying was a recommendation for the consideration of optimizing hatchery production. As stated in the document, inclusion of the threshold was not well supported by members of the RPT at that time, and further recommends ongoing research be used to determine the effects of hatchery straying. This work is currently being conducted on a broad scale through the Alaska Hatchery Research Project. The ADF&G pilot study for Lower Cook Inlet (LCI) streams referenced in the proposal does not conclude that PWS hatchery strays are negatively affecting the productivity or sustainability of LCI pink salmon. There are no stocks of concern currently listed for LCI pink salmon.

Proposal # 172: OPPOSE

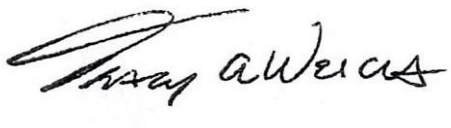
UFA is opposed to proposal 172. UFA does not support any board-generated regulation that caps or limits hatchery production by the Alaska Board of Fisheries. Authorization of hatchery permits and production is an exclusive responsibility of the ADF&G Commissioner, considering available science and the precautionary principle, economic need and program viability to evaluate new production requests. UFA questions the board's authority to set hatchery production through regulation, as its role beyond the consideration of the original hatchery permit request is limited to the allocation of hatchery produced salmon. It should not adopt regulation that limits or conditions a hatchery permit through a moratorium because it clearly restricts the authority of the Commissioner and removes the Regional Planning Team's role in defining regional production, as granted in 5 AAC 40.340. The proposed moratorium would prohibit future hatchery production until the "resolution of uncertainty in the science regarding hatchery-wild effect" can be determined. UFA would point out that some of those uncertainties may never be determined, given the scope and cost of the research required to achieve certainty.

The Board has consistently continued to defer decision-making and oversight of hatchery programs to the Commissioner and ADF&G. UFA encourages the Board to continue in this vein by rejecting proposals 170, 171 and 172.

2024 marked the 50th year of the Alaska's Private Nonprofit Hatchery Program. Alaska's hatcheries are center to the sustainability and economic viability of our commercial, sport, substance and personal use fisheries, each of which rely on substantial hatchery production. UFA supports the ongoing efforts of the Alaska Hatchery Research Project to better quantify hatchery-wild interactions. Until that research is concluded, its findings are put into perspective and evaluated against existing hatchery policy by ADF&G, the board should refrain from taking any of the above requested actions.

Thank you for your careful consideration of our comments. UFA looks forward to participating in further discussions regarding these proposals.

Regards,



Matt Alward
President

Tracy Welch
Executive Director

UNITED SOUTHEAST ALASKA GILLNETTERS

Box 2196, Petersburg AK 99833 * (253) 279-0707 * usag.alaska@gmail.com * akgillnet.org

USAG'S MAIN PURPOSE IS TO PROTECT, SERVE AND ENHANCE SOUTHEAST ALASKA'S COMMERCIAL GILLNET FISHERY

February 28, 2026

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

United Southeast Alaska Gillnetters will offer comments for the following proposals before you for consideration at Statewide Finfish in Anchorage March 17-21, 2026.

Proposal 170- Oppose. Our organization has opposed every proposal that would allow the Board of Fisheries to dictate hatchery production. We will continue to do so, as we understand the Regional Planning Team process, which makes recommendations to the commissioner for permitting. The RPT meetings are public noticed, and at least in SEAK are very accessible for comments and questions from anyone willing to participate. All permitting is done within the bounds of the Sustainable Salmon Policy and using the precautionary principle.
A 25% reduction would be economically crippling to the hatchery programs themselves, and the fishermen and processors that use that production. All three commercial gear groups in SEAK are dependent on hatchery chum production. It has helped immensely to keep us viable. Sport fishing opportunity would also be impacted, as many sportfishermen target hatchery produced king salmon and coho. A 25% reduction in chums and/or pinks would reduce revenue to the PNP's. As kings and coho are much more expensive to raise than chums and pinks, those programs would likely be the first to go.
The proposer contends wild runs are being impacted by hatchery production. In SEAK, the Chilkat and Taku Rivers have recently had robust king salmon returns, and sockeye returns have been solid. While we have seen small fish some years, we also saw that prior to the time period when there were large hatchery programs. In recent years, sockeye sizes have been normal, and king salmon sizes also appear to be increasing.

Proposal 171- Oppose. We do not believe consideration of this proposal is in the purview of the Board of Fisheries. It is in the purview of the PWS RPT, and the Commissioner of Fish and Game, in accordance with the Sustainable Salmon Policy and using the precautionary principle.
Salmon are colonizers, so straying of any salmon is natural. There is little, if any conclusive data to indicate what a natural stray rate is, or what triggers straying. There is no conclusive evidence that strays have a deleterious impact on wild fish.

Proposal 172- Oppose. We cannot support a board generated proposal that would go outside the prescribed process for permitting enhanced releases. The proposer implies that the Alaska Department of Fish and Game has either been either negligent or inept in the consideration of hatchery releases, and that the BOF should take it out of the hands of the current statutory process.

That somehow, a politically appointed board would come to a more correct decision than a bunch of scientists, whose expertise in the subject matter far exceeds any board members. It would be presumptuous for the board to act on this, or Proposals 170 and 171 based on "may", "could be", or "might". These are words not often associated with conclusive science. If the board has an opinion of the permitting of hatcheries, they are free to express those opinions to the commissioner, or the RPT's for their consideration in permitting. In fact, all three of these proposals would be better served, and the public better served, if they were submitted as agenda items to the appropriate Regional Planning Teams.

We appreciate the opportunity to comment, and will be available at the meeting to further discuss these proposals.

Sincerely,

Max Worhatch, Executive Director

VALDEZ FISHERIES DEVELOPMENT ASSOCIATION, INC.
SOLOMON GULCH HATCHERY

PC483

[redacted] Valdez, AK. 99686 [redacted] Valdez, AK 99686

February 28, 2026

Alaska Dept. of Fish & Game
Alaska Board of Fisheries
PO Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
dfg.bof.comments@alaska.gov

RE: Proposal 170 – 5 AAC 40.XXX New Regulation – Reduce the permitted egg take level of each hatchery permit containing pink and chum salmon by 25% of the current permitted capacity for those species
Proposal 171 - 5 AAC 40. XXX New Regulation - Amend Prince William Sound hatchery permits to reduce pink salmon egg take capacity
Proposal 172- 5 AAC 40.XXX New Regulation - Board generated regulation that places a moratorium on pink and chum hatchery production

Chairman Carlson-Van Dort and Members of the Alaska Board of Fisheries:

Thank you for the opportunity to submit comments on proposals submitted to the Alaska Board of Fisheries (Board) at the Statewide Finfish and Supplemental Issues meeting this year. The Valdez Fisheries Development Association, Inc. (VFDA) provides the following comments **in strong opposition to Proposals 170, 171, and 172**.

VFDA Pink Salmon production contributes significantly to the economies of Southcentral Alaska. From 2020-2025, Prince William Sound (PWS) seiners harvested an annual average of 80 million pounds of VFDA pink salmon worth $43 million.[1] In 2025 alone, VFDA's estimated return of 26 million pink salmon provided nearly 70% of the ex-vessel value to PWS seiners.[2]

VFDA Coho Salmon production has created one of the largest sport fisheries in Southcentral Alaska. Juvenile coho salmon releases supported an annual average sportfish harvest of 26,800 coho salmon from 2017-2024.[3] Shore-side anglers caught an additional 10,300 pink salmon during that same period. Coho returns generated approximately $9.9M in sportfish economic impact during that time, primarily within the community of Valdez[4]. In addition, VFDA releases 20,000 SGH coho annually at no charge through a cooperative partnership with the Native Village of Tatitlek to provide subsistence harvest opportunities for its residents.

There is no statutory mechanism to collect sport fish revenue from users to fund private nonprofit hatchery sportfish programs in Alaska. Pink salmon production at Solomon Gulch Hatchery funds an estimated 65% of this fisheries enhancement program. When capital costs for infrastructure construction and debt retirement are included, this percentage is even higher. **Without the permitted pink salmon production at SGH to fund sport fisheries development, there would be no coho sport fish program in Valdez!**

The economic, social, and cultural benefits of VFDA's enhancement programs, like those of all Alaska's private nonprofit salmon hatcheries, are vast and far-reaching. For these reasons, any attempt to reduce its

[1] Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)
[2] Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)
[3] Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)
[4] Economic Impact of the Valdez Fisheries Development Association (McKinley Research Group 2026)

permitted egg take capacity, or for the Board to stray beyond its statutory authority is taken very seriously and VFDA will vigorously defend its ability to maintain our programs that provide continued benefits to Alaska's sport, commercial, and subsistence fisheries.

The adoption of these proposals will have real consequences to hatchery contributions to sport fisheries. VFDA stands at the precipice of a milestone decision on whether to invest nearly $10 million in constructing a new coho and Chinook Salmon rearing facility to enhance our existing coho smolt program and eventually provide significant chinook salmon sportfish opportunities. This decision requires confidence that our pink salmon program can continue operating without disruption. Board actions that condition hatchery permits undermine that confidence and could terminate further consideration of this investment.

VFDA submits the following comments in opposition to proposals 170,171, and 172.

<u>Proposal 170</u> – 5 AAC 40.XXX New Regulation – Reduce the permitted egg take level of each hatchery permit containing pink and chum salmon by 25% of the current permitted capacity for those species

This proposal has been submitted repeatedly since 2018, and each time the Board has appropriately rejected it. No new information has been presented to substantiate claims that Alaska hatchery production is negatively impacting wild salmon stocks, particularly in Western Alaska. Frequently cited opinion papers on pink salmon interactions fail to demonstrate any mechanistic link showing that hatchery pink or chum salmon is causing harm. In contrast, hatchery operators have consistently provided scientific research demonstrating that climate, predation, and environmental conditions affecting fresh water residency-such as permafrost melt, water flow, and temperature-are primary drivers affecting these stocks. We have demonstrated that hatchery pink salmon abundance makes up just 15% of all pink salmon in the North Pacific Ocean, Alaska hatchery production accounts for roughly 4% of that total, and less than 0.5% of the total nekton biomass[5]-hardly sufficient to create the large-scale trophic disruptions to the marine food web that have been suggested.

Adoption of Proposal 170 would have immediate impacts on VFDA. The following points were submitted as PC620 at the PWS/CR Finfish meeting in 2024 as response to Proposal 78. Because the proposal remains unchanged, these summarized comments, submitted previously remain relevant:

- VFDA's permitted pink salmon egg take capacity would be reduced by 67.5 million eggs, leaving 202.5 million eggs-levels not operated under since 1992. Total PWS egg takes of pink and chum salmon would be reduced by 199 million and 41 million eggs, respectively.
- While annual returns depend on ocean conditions, based on an historic average marine survival rate of 6.27% for SGH, the seine fleet could lose approximately 4 million adult pink salmon annually beginning in 2029. At an average grounds price of $0.41[6] per pound, this represents an estimated $5.5M loss in annual ex-vessel value from VFDA alone.
- Total PWS ex-vessel losses from a 25% production reduction are estimated at $10.8M in pink salmon and $3.6M in chum salmon, based on a ten-year average (2012-2024[7]). Losses in first wholesale value to seafood processors, raw fish taxes, and enhancement tax to hatchery operators would exponentially compound these impacts
- In 2024, the total commercial harvest for PWS pink salmon was 9.95 million salmon, the lowest pink salmon harvest since 1993 and 1.70 million chum salmon triggering a disaster declaration as fishermen experienced combined losses approaching $85 million[8]. Hatcheries contributed 30% of the statewide commercial salmon harvest.[9] Hatchery pink and chum salmon comprised roughly 90% of hatchery-

[5] High Ocean Biomass of Salmon and Trends in Alaska Salmon in a Changing Climate (Wertheimer, Heard 2018)
[6] Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1)
[7] Regional Information Report No. 5J-09 ADF&G Staff comments (table 78-1&2)
[8] Letter from Governor Dunleavy to Acting Secretary of the U.S. Dept. of Commerce- January 2025
[9] Regional Information Report No. 5J25-02 – ADF&G

produced fish and generated approximately $47 million in ex-vessel value that year.[10] A 25% reduction would have removed nearly $12 million from an already distressed fishery.

- Reducing production of the most abundant salmon species would set a precedent with ripple effects throughout the seafood industry. Reduced hatchery harvest opportunity would increase pressure on wild stocks.
- The instability created by this action may affect our ability to borrow funds from the enhancement revolving loan fund and retire our debt. Production will be uncertain from year to year, rendering an inability to confidently plan for long and short-term financial stability.
- If adopted, VFDA will be required to amend the SGH Annual Management Plan and submit a significantly revised plan to the Regional Planning Team prior to April 1, 2026.
- VFDA will be forced to adjust its operating model to fit a much lower level of production. Lower returns to SGH may reduce our ability to generate corporate escapement more reliably, especially in years of low ocean survival, and/or reduce our ability to provide for a significant public benefit.
- Operational adjustments would require staff reductions and strand capital infrastructure investments we made to produce pink salmon at current permitted levels previously approved by ADF&G.
- VFDA would likely suspend plans for a new coho rearing facility due to uncertainty regarding future Board actions, eliminating progress toward developing a Chinook sport fishery in Valdez.
- Approximately 65% of VFDA's coho sportfish operating budget is funded through pink salmon cost recovery. All existing and future hatchery infrastructure needs require funding by pink salmon cost recovery revenue.
- Additional requests to reduce hatchery pink salmon, which will certainly be forthcoming if this proposal is adopted, could jeopardize the long-term viability of the coho program.

As stated previously, this proposal is ill- advised and reckless. It is wholly arbitrary and capricious, and offers no measurable standard to determine whether production cuts would improve declining salmon stocks. It will harm VFDA and other Alaska hatchery programs in pursuit of an experiment to try to increase Western Alaska salmon abundance. VFDA respectfully requests that the Board once again **reject** Proposal 170.

<u>Proposal 171</u> - 5 AAC 40. XXX New Regulation - Amend Prince William Sound hatchery permits to reduce pink salmon egg take capacity

VFDA considers straying an area of particular importance and actively works to minimize the loss of economic value to harvesters and decrease interactions with wild salmon. We apply best management practices to reduce opportunity for fish to stray by aggressively prosecuting fisheries on our returns to remove as many hatchery pink salmon from the environment as possible. Hatchery operators have invested nearly $4.25 million into the Alaska Hatchery Research Project (AHRP) to better understand the effects of hatchery straying. This study is yet to determine the effects of genetic introgression, its significance, and align these findings with sustainable salmon policy.

This non-regulatory proposal calls for unspecified changes in PWS pink salmon hatchery production sufficient to reduce straying into Lower Cook Inlet streams to levels specified in the Prince William Sound/Copper River Comprehensive Salmon Plan. **However, this proposal provides no specific actions for the Board to consider; therefore rendering any action by the Board as completely arbitrary!**

The author's use of the study, *(Otis et al. 2018. Observations of Pink Salmon hatchery proportions in selected Lower Cook Inlet escapements, 2016-2017,* completely misses the mark to attempt to demonstrate harm. *Otis et al.*, was a pilot study conducted to determine the presence of hatchery strays in Lower Cook Inlet (LCI) streams and nothing more. While the study successfully demonstrated presence and origin of hatchery strays, including those of PWS hatcheries, presence alone is no indication of harm. There are no pink salmon stocks of concern in LCI.

[10] Regional Information Report No. 5J25-02 – ADF&G

Percentages can be misleading, particularly when the overall number of samples are low. The study shows no correlation between the numbers of hatchery marks found in streams and the overall escapement in order to estimate true magnitude. As an example from *Otis et al.*, PWS hatchery marks for Humpy Creek in 2017 totaled three fish. Total escapement for Humpy Creek that season was estimated at 71,073 pink salmon. While the percentage of PWS hatchery strays was estimated to be 2.1% in that stream, three fish is hardly enough to create concerns of genetic impacts affecting fitness or run timing. Cumulative percentages from individual PWS hatcheries for the study period ranged from .03 to 10.6%, showing significant variability between hatcheries and all within comparable ranges for wild pink salmon.

AHRP research, using thousands of pink salmon samples, demonstrated an estimated reduction in RSS of 50% in first generation (F1) hybrid crosses. However, new information presented by the department this year shows that RSS improves significantly in the next generation (F2) to as much as 85% in odd year linage[11]. This is a positive sign of the regenerative nature of pink salmon to reverse maladaptive traits quickly.

The proposal states that high stray rates violate criteria in the *Prince William Sound/Copper River Comprehensive Salmon Plan* specifying that the proportion of hatchery salmon straying into wild-stock streams must remain below 2% of the wild-stock escapement over the long term. Here is what the language in the comprehensive plan states:

From the Executive Summary (emphasis added):

> *The PWS/CR RPT recommends that five biological and economic criteria be employed to recognize optimum production as the hatchery program in Prince William Sound is further developed and fine tuned….. (2)the proportion of hatchery salmon straying into wild-stock streams must remain below 2% of the wild-stock escapement over the long term;*

From the report (emphasis added):

> *At the present time, the straying rate of hatchery salmon in wild-stock streams is not known. A monitoring program should be implemented to periodically estimate the rate of hatchery-salmon straying into wild-stock streams, and to better define genetic stock boundaries in PWS. If it is determined that the rate of straying is significantly greater than the acceptable threshold of 2%, the PWS/CR RPT will determine whether and to what extent the hatchery program in Prince William Sound should be modified to reduce the rate of straying. The PWS/CR RPT recognizes that the present estimate of the acceptable threshold of hatchery-salmon straying is not well supported. Further research is needed to improve our confidence in the estimate of acceptable hatchery-salmon straying rates. This work must include studies to determine the effect of interbreeding of wild and hatchery salmon on the productivity of wild salmon. Hatchery operational strategies that may minimize straying or the effect of hatchery-salmon straying should also be examined.*

As stated, the 2% stray threshold is a **recommended** biological criterion for consideration during the optimization of hatchery production in PWS, hardly a bright line that PWS hatcheries are in violation of. It is believed this metric came from studies done on coho salmon in the Pacific Northwest, which did not consider that natural pink salmon stray at greater rates (9-50%)[12] or in some studies lower, but certainly not below 2%. Finally, much has been done since 1994 to implement the suggestions made in the plan, such as monitoring to periodically estimate stray rates and address the effects of interbreeding. The department has conducted at least four evaluations of straying, (*Moffit, Brenner et al, 2013, Joyce TL et al, 1999, Sharp et al, 1995 and Sharr et al. 1994)* and the AHRP was established to define genetic stock boundaries and determine the effect of interbreeding of wild and hatchery salmon on the productivity of wild salmon. Much has been learned over the last 40 years and while there is much more to understand, it should be clear to all that containing pink salmon straying to 2% is impossible to achieve. Future evaluations of this phenomena, resulting from millennia of

[11] Second generation fitness consequences of Pink Salmon hatchery-origin strays in Prince William Sound (Shedd et al. 2026)

[12] Sharp et al., 1994

genetic pre disposition, will likely result in the establishment of much higher guidelines going forward. VFDA respectfully requests that you **reject** Proposal 171.

<u>Proposal 172</u>- 5 AAC 40.XXX New Regulation - Board generated regulation that places a moratorium on pink and chum hatchery production

VFDA opposes any Board generated regulation imposing a moratorium on hatchery-produced pink and chum salmon. We strongly question whether the Board has authority to condition hatchery permits or preempt the Commissioner's statutory role and that of the Regional Planning Teams as specified in 5AAC 40.340.

We have strong concerns that any moratorium will remain in perpetuity and result in a de facto cap on production, even when reasonable and justifiable considerations should be made. Given the scientific complexity surrounding hatchery-wild interactions, complete certainty may never be resolved. It remains unclear what arbitrary standard would be required to lift such a moratorium.

There remains a great deal of misunderstanding surrounding Alaska's hatchery programs. Many feel that hatchery production is on a steadily upward trajectory, when in fact it is stable with many hatchery programs at full capacity. Regions like LCI are not even meeting current production goals and may never. Little if any increase should be expected in future years. However, small program adjustments must be allowed to balance allocations between gear groups, or adjust species production for program sustainability.

The hatchery associations have honored an understanding with Commissioner Vincent-Lang referenced as RC240. We value the need to resolve existing questions regarding hatchery/wild interactions. The Commissioner should be the one to determine this matter before the board using a case-by-case basis where appropriate. If a new commissioner also decides to pause the approval of permit alterations until those questions can be answered VFDA will honor that as well. But codifying a moratorium in regulation is wrong, outside the Boards authority, and sidesteps the science and process intended by the legislature. We respectfully request that you **reject** Proposal 172.

VFDA would like to thank the Board of Fisheries for the opportunity to provide comment and perspective on these proposals. **We would respectfully request the board reject Proposals 170,171, and 172.** Thank you for your consideration.

Sincerely,

Mike H. Wells
Executive Director

Submitted by: Benjamin Van Alen
Community of Residence: Juneau, Alaska

The Board of Fisheries should deliberate and vote on Proposals 170, 171, and 172 at this March 17-20, 2026 "Statewide Finfish and Supplemental Issues" meeting. These three proposals seek to restrict hatchery egg takes. I strongly support these and any proposals that seek to constrain the adverse ecological consequences of production hatchery releases.

I encourage Board members to understand that for hatchery releases to have an economic benefit they must have an ecological benefit. I encourage Board members and all fisheries participants to read the open access article titled "Hatchery Salmon and Ecological Overshoot" (https://doi.org/10.1002/aff2.70103). (attached below)

I am unable to find an ecological niche for 'ocean ranched' hatchery salmon and I encourage others to openly question and respond to this topic too. I strongly support having this subject deliberated in the Board of Fisheries open public process. The Commissioner of Fish and Game and Fish and Game staff will benefit and hopefully respond to questions and concerns from the Board of Fisheries.

see attached publication

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Rod Van Saun, and I am a resident of Ninilchik, Alaska.

I am writing to urge the Board to reject Proposals 170, 171, and 172. This attempt to limit or shut down hatcheries is foolish. There is zero science to support or justify such extreme action.

These proposals would absolutely hurt my family and hurt thousands of Alaskans who depend on these fish for sport fishing, dip netting, and commercial fishing. Our area depends heavily on strong salmon returns. It would negatively affect people's ability to even live here.

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

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

Sincerely,

Rod Van Saun
Ninilchik, Alaska
[redacted]

Chairman and Members of the Board of Fisheries,

My name is Teague Vanek. I have drift fished for salmon in Cook Inlet every year except for two seasons since I was 12 years old. That's 47 years of fishing. For many years, the average escapement into the Kenai River was just over 700,000 sockeye and the average commercial harvest for Cook Inlet was 5.2 million sockeye. During that time, the drift fleet fished inlet wide two days a week with additional time when escapements allowed for it. That was considered a balanced and conservative way of allowing a good harvest and providing for passage of fish through the Central District. With that level of fishing, there was never a conservation concern for coho in the Northern District, and sport fishing in Northern streams was largely left open. Commercial harvest rates for coho were still very low and combined commercial and sport harvest stayed well below the acceptable 70% rate.

Then the restrictions on the commercial fleet started happening. Bit by bit the inlet got chopped up into ever smaller areas and "sections" which are extremely difficult to fish because of the large tides in Cook Inlet. Then, one by one the little areas have been given regulated closures until we've been nearly shut out of most of the productive fishing places. The result has been that instead of an average harvest of 5.2 million sockeye, we call 3 million harvest a big season, and escapements into the Kenai and Kasilof Rivers are regularly three or more times what is needed. Our harvest rate of cohos used to be 10%-12% at best, now it's only 1%-3% of the total run. Why is it that the drift fleet needs to be so completely shut out of the harvest?

Now, you have Proposal 186 (which is allocative and shouldn't have been taken up out of cycle) that asks for a complete closure of one of the few remaining productive fishing areas after July 15th, when the best fishing occurs. With the drift fleet's already extremely low harvest rate of 1%-3% of coho salmon, the resulting degradation of our fishery is simply not worth it.

Some people think that the sockeye not caught by closing the middle of the inlet can instead be caught in the corridors nearer to shore. It's simply not true. Just look at recent years where we've been given back-to-back, day-after-day fishing in the corridor and still have had tremendous grossly over escaped rivers of wasted sockeye.

Please reject Proposal 186. Not just because it was improperly taken up out of cycle, but also because of the needless harm it would impose on the commercial fishery and the very small gain you would get by further restricting a fishery with only a 1%-3% harvest rate on coho salmon.

Teague Vanek

PC487

Submitted by: Steve Vican
Community of Residence: Cordova

As a year round cordova resident ,area e drift gilnetter,and father of five, I ask that you please not accept props. 170,171,172. I cannot stress enough about how much our hatcheries mean to us residents of P.W.S. . Something like this would really put the screws to our fractured and dying economy. These hatcheries make up 75% of my income. Its not just that these props. not only erode our economy and lively hood, they lack in a proven factual scientific base. Thank you for your time and service , with respect, Steve Vican

---

PC488

Submitted by: Steven Vincent
Community of Residence: Soldotna

163, 164, 165. I adamantly request that the BOF vote for the cessation of all Botton Trawling in State Waters. Bottom Trawling (and mid-water trawling when in contact with the sea floor)"rototills" the sea floor causing irreparable damage and releasing substantial amounts of carbon dioxide.

A vote for the cessation of bottom trawling is a positive vote for the future of our Alaskan fisheries and the people of our great state.

PC489

Submitted by: Garret Vincentz
Community of Residence: Ketchikan, Alaska

I am asking the Board of Fish to OPPOSE proposals 170, 171, and 172. My name is Garret Vincentz and I am a commercial fisherman based in southern Southeast Alaska. I have been a resident of the state for 15 years and have been fishing in Alaska for my entire adult life after graduation from college with a bachelor's degree in fisheries and aquaculture. I currently am a board member for Southern Southeast Regional Aquaculture Association (SSRAA) as well as Southeast Alaska Seiners (SEAS), however I will be submitting my comments solely on behalf of myself.

I have listened to and participated in many BOF meetings since becoming a limited entry permit holder and I have noticed, particularly in the last several board cycles and regardless of the meeting location, that the subject of hatchery implications upon our wild stocks and natural environment has become a hotter topic over the course of time. It has been revisited around the state, with the typical responses coming from both sides of the argument. To keep my comments concise, I will skip the immense fiscal, socioeconomic and cultural benefits that hatcheries provide to the people of the state of Alaska and citizens of the United States of America, as you have heard those positions from voices all around Alaska. With this said I was alarmed by the Board of Fish's close decisions with regards to hatchery proposals at its most recent Southeast Alaska meeting in Ketchikan, despite overwhelming public support for hatchery production in our region.

A slow accumulation of scientific data, that quite honestly is clear as mud with respect to hatchery salmonids effect on wild stocks, has come forward as the question of hatchery effects has come more into focus. I would point out that it would appear to take many, many decades of data to account for variations in the inshore and offshore environments that have in modern times fluctuated greatly with high frequency. Simply put, it may take too long to scientifically access the answer to the hatchery impact debate accurately. While these studies have resulted in very good observations and information it would be and is impossible to quantify any of them as scientific law, regardless of where the publisher stands on the hatchery issue.

From a 10,000 ft view I ask the board to consider what the real implications to our coastal resources are, should hatchery releases be curtailed. I ask you to recognize that the state decided long ago how, where, and to what degree hatcheries would become entwined in our natural world. While we debate how much is too much, the entire food web of the north pacific has evolved to cope with what humans have implemented. That food web is reliant on hatchery produced salmon at this point in humanity, whether we like it or not. If a decision to cut hatchery production is ever implemented, it should be done with extreme caution. We all know the benefits that have come from hatchery produced salmon for many species on this planet including humans. What we don't know is what the ripple effects will be should humans take that production away. From an ecological standpoint I fear that there is a strong argument to be made that we may have come too far to go back now.

In summary I hope that your decision to OPPOSE hatchery production cuts and curtailment at the statewide level settles this redundant issue that the Board of Fish has been forced to revisit time and time again, albeit with the same decision and precedent repeatedly.

PC490

Submitted by: Michael Walsh
Community of Residence: Juneau

Oppose proposition 170, 171,and 172

PC491

Submitted by: Daniel Warta
Community of Residence: Palmer

I am writing in support of PROPOSAL 186 – 5 AAC 21.353.

I have lived in Alaska for my entire life (29 years) and have fished the valley rivers for as long as I have been old enough to hold a fishing pole. As a young kid, bait day on the Little Su was always a date I excitedly looked forward too. We would get up at 3AM in the morning to drive out to the Little Su, where my 7 siblings and I were all but guaranteed a limit of cohos. These fish would go directly into our freezer, not only making lifetime memories but also providing a significant source of food for our large family. Because of how abundant coho salmon were and how aggressively they attacked, fishing for them was the perfect way to introduce a young Alaskan to salmon fishing.

Today, I have nieces and nephews that are around the same age I was when I started fishing for cohos. I would love to introduce them to salmon fishing the same way I was, but it no longer seems practical. It is hard to plan on bait day because of the unreliable runs, and even if it does remain open the ethics of fishing seems questionable due to the depleted coho numbers by the time they reach the river.

I understand that the state wants to maximize harvest when sockeye salmon are in abundance, but this is coming at the cost to the rivers and the people in the Matsu valley. I have no issue with the commercial harvest of surplus sockeye, but this should not come at the cost of local residents and their ability to stock their freezers. I realize that coho in the valley is primarily considered a sport fishery, but to Matsu valley residents it is so much more.

Please consider approving Proposal 186 to give the Matsu coho run a chance. Thank you.

Submitted by: Luke Warta
Community of Residence: Anchorage

I am writing in support of proposal 186. I have been sport fishing for coho salmon since the age of 3 or 4, and it has been instrumental in developing my love of fishing and out door recreation. I consider it one of the best entry points for younger anglers due to its aggressive strikes making it easy to hook, reasonable size making it challenging yet manageable to land, and providing excellent table fare unlike most stocked fish. Its importance has only increased with the collapse of the chinook fishery, and while I have nothing against commercial fishers benefitting from the recent exceptional sockeye runs, I consider it paramount that we protect the coho runs to the best of our ability.

I am a lifelong Alaskan, currently living in Anchorage. I have witnessed the consistent decline of our salmon fisheries in the Susitna and Knik arm drainages, both Kings and Coho. I urge the board to uphold the state's duty to provide for ***sustained*** yield and to hold our resources in common for future years and generations.

I strongly support Proposal 186. 5AAC 39.220, the policy for the management of mixed stock salmon fisheries states "*In applying this statewide mixed stock salmon policy for all users, conservation of wild salmon stocks consistent with the sustained yield shall be accorded the highest priority*". Northern district coho have greatly declined. The last fully enumerated run to achieve the low end of the little Susitna River's escapement goal was 2021, and the last year that the Deshka river achieved its low end was 2019. Additionally, all of the last three years the Little Susitna River and Deshka River have been closed to coho salmon sport fishing prematurely.

The Alaska Department of Fish and Game has consistently argued that it is not possible to manage Cook Inlet coho in the mixed stock fishery with in-season data, citing variable run timing and lack of in-season data. This has been seen consistently throughout recent history, with northern district streams being targeted by in-season restrictions that cripple the coho fishery, while the Central District drift fleet harvests large numbers of coho. Some years the in-river fisheries have been restricted within days of the Central District drift fleet harvesting tens of thousands of northern bound Coho. Again and again, we have seen that it is not possible to manage this mixed stock fishery in season.

This bad situation was made significantly worse by the Kenai River late run King Salmon Stock of Concern Management plan, which forced the central district drift fisheries off shore and shut down the much more selective set net fishery. The Central District drift fishery harvests far more northern bound salmon than the East-Side set net fishery, especially seen in the relative harvest of Coho salmon. Bringing the Central District drift fleet closer to shore will help with this issue, while allowing for harvest of Kenai and Kasilof Sockeye and not endangering the Kenai Kings.

Ultimately, it is imperative that the board strengthen the conservation corridor, that area east of the Kenai and Kasilof extended area, to protect a fishery that the department is unable to manage in season. To allow the Central drift fleet to harvest northern stocks indiscriminately in their quest to harvest Kenai and Kasilof fish is a betrayal of our State's duty to protect both sustainability and common use. If more time in a smaller area is necessary to harvest the Kenai and Kasilof sockeye, that is an appropriate goal, but to allow the fleet to fish in an area known to contain a higher proportion of mixed stocks is irresponsible.

I strongly support proposals 179 and 180. I submitted proposal 179 to help protect our King Salmon stocks across the state. There is currently no statewide annual limit, allowing for

exploitation of a species without a harvestable surplus. King Salmon continue to dwindle across the state, and there are significant areas not covered by any annual limit.

The most common objection to my proposal has been that the fish that we kill ***might*** not be “ours”. This is a pathetic reason to indiscriminately harvest a species that is struggling across the Pacific Northwest. Due to difficulties in funding and research, we have limited, if any, information regarding the origin of the fish harvested in many of our marine fisheries. Proposals 179 and 180 would force the marine sport fisheries to also share the burden of conservation, and protect King Salmon stocks across Alaska, and the broader Pacific Northwest.

I submitted proposal 182 to expand the use of archery tackle for species that there are not conservation concerns for. Archery is a unique, fun, and selective method of targeting specific species. Additionally, it would allow for immediate targeting of new invasive species if they were to appear, while not significantly endangering vulnerable native species.

Submitted by: Mike Webber
Community of Residence: Cordova

My name is Mike Webber. I am of Tlingit, Eyak and Sugpiaq heritages. I am a Kalaikh Kaagkwaantaan Yedi. My Tlingit name is “Kaeiaou”. This name means a new beginning. That name was given to me during a potlatch of my Tlingit grandfather with family members from Cordova and Yakutat. On my father side, he is Tlingit and Eyak. His family went from Eyak (Cordova), Katella, to the Kaliakh River to Yakutat. He was raised in village of Katella until he was 7 Years old. That village has been abandoned shortly after he left as a child.

The Kaliakh river is my traditional families river for over 1,000’s of years. When I said the clans name “Kaliakh Kaagkwaantaan”, that give you a destination of where I am from traditionally. It is also known as Galyax Kwaan area, the Eyak peoples name for that river.

My family still fishes that river. My son Teague Webber has been fishing that river since he was 5 years old and now is 12 years old. He knows that this is our traditional families river and looks forward to go fishing there spiritually and physically. I have been commercial set netting that river for 9 years straight. My dads brother Jim Webber commercially fished that river in the 50’s and 60’s. My grandmother has also fished that but is a different setting. Meaning, she as a young girl fished there traditionally for the riches and wealth from the food they caught. This tradition has been happening for ever.

Back in the day, rivers were given to different families by leaders or chiefs of the village. Village family members would go to their own river to get their traditional foods salmon, seals, bears, medicines berries and what ever else what was in the chosen area for that family. This way, they would not have to compete with other village members. When summer and fall was over, all the different families would move from there chosen rivers and haul their foods and medicine back to the main village to live together in the winters and spring times.This still happens today in my mind, I go back to the Kaliakh to fish that river to get my riches in food and to make a living in commercial setnet fishing. I fish that river because its in my blood, in my families blood.My ancestors are their, I feel their presents when I am their and I thank them for what they created for me. My ancestor guide me in the 130 mile one way trip to get to the Kaliakh river. They help guide me into the 100 foot wide ocean bar entrance when I come and go. I ask for their guidance and thank them. My ancestors are my gods, I pray to them. My ancestors are buried from Eyak (Cordova) all the way to Yakutat. I was gifted the knowledge of the “Lost Coast” and I use that knowledge for safe guidance. The Kaliakh River has been gifted to my family from the great chiefs 1,000’s of years ago. Its a true gift to me.

In the last 5 years, the Tsiu river is the only River moving to the east, rest of the rivers are moving to the west on the North gulf coast. In 2025, the Tsiu river ran into the Kaliakh River very close to the mouth the river. In my mind, I do not believe the rivers will run into each for much longer, feeling the Tsiu will relocate its self to the east again like before.

For 25 years, I ran freight to 3 out of 4 sport fishing lodges. Items like fuel, building supplies, septic systems, windows and doors to build their lodges. I worked with them, we communicate with the guides to try and avoid any possible conflicts. But one lodge stood out, they alone has raised havoc with us commercial set netters from the beginning. They do not communicate with us and now they put in a proposal to tell us where to fish and not to fish. As a Alaska Native commercial fishermen from my traditional river, I strongly disagree with that lodge and in my hope to see their proposal turned down by the Board of Fish. My families will continue to fish this river as I do, its a gift from our ancestors and its up to us to protect it when it is needed.

My family and ancestors have been fishermen for thousands of years. We know where to fish, where to put our nets. We look for deep water, deep water on the Kaliakh is only 3-8 ft depending on tide. That deep water has always been the best area to fish historically.

Now the Tsiu river relocated its mouth into that deep water area of the Kaliakh. Proposal 187 wants to close 1/2 mile of the Kaliakh river effectively eliminating all commercial fishing opportunity on both rivers. As

commercial fisherman, we need to adapt daily to ever changing river conditions. But one thing stays the same the deep water is always in the same spot. Above, below and around the confluence. This is where we need to fish and the same spot that was fished by my ancestors.

The in river escapement has never been behind, even early in the Coho season. The late season escapement is always way more then need in the Tsiu river. The sports fish catch has been almost identical in the last decade. So why is that one lodge raising a stink when there is enough fish for everyone. This is what we are dealing with. Vote down that one lodges proposal. That proposal does not hold ground to anything.

Mike Webber

Western Interior Alaska and Eastern Interior Alaska
Subsistence Regional Advisory Councils
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To
OSM.R26002

January 20 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

We write to you on behalf of the Western Interior Alaska and Eastern Interior Alaska Subsistence Regional Advisory Councils (Councils) to provide comments on Alaska Board of Fisheries proposals being considered at the upcoming Alaska Peninsula/Aleutian Island/Chignik and Statewide Finfish Meetings.

The Councils represent subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Interior Alaska. They were established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and are chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Councils' charters establishes the Councils' authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Councils also review resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Councils. The Councils provide public forums for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within their regions.

The Councils held a joint public meeting October 17, 2025, in Fairbanks and voted to submit the following comments.

Alaska Peninsula/Aleutian Island/Chignik Meeting

The Councils **support proposals 127, 128, 129, 130, 131, 132, 133, 136, 140, 141, and 148**. These proposals seek to implement Chinook and Chum salmon savings measures in commercial fisheries that intercept Arctic-Yukon-Kuskokwim bound salmon. Escapement goals for Chinook and fall Chum salmon are not being met on the Yukon River. Yukon River salmon stocks need to be protected across their entire range, not just in-river, or else we risk losing these stocks forever. Every

salmon counts in an effort to rebuild runs. Subsistence fishers have been long been bearing the burden of conservation, and the subsistence priority is not being upheld. These proposals will help distribute a small amount of that burden by reducing interception in commercial fisheries.

Statewide Meeting

The Councils **support proposals 163, 164, and 165**. Efforts to better regulate trawl fisheries are long overdue. These proposals will do that by helping to clarify definitions, setting standards for monitoring, reducing bottom contact and subsequent habitat destruction, and requiring the use salmon excluders as is done in other fisheries to reduce salmon bycatch.

The Councils **support proposals 170 and 172** that seek to reduce egg take and overall hatchery production. A growing body of scientific evidence shows that hatchery salmon compete with wild salmon for resources and impact the diet, growth, fecundity, productivity, and abundance of wild salmon and other species in the marine environment. The State of Alaska needs to reduce hatchery production so that our struggling wild salmon stocks have a better chance at health and survival. Not only does this need to be done domestically, but State and Federal governments must also collaborate with other nations to reduce international hatchery production throughout the north Pacific Ocean.

Thank you for considering our comments on the above proposals. If you have any questions or would like to follow up, please contact us through our respective Subsistence Council Coordinators:
Brooke McDavid (Eastern Interior), at (907) 891-9181 or brooke_mcdavid@ios.doi.gov or
Nissa Pilcher (Western Interior), at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,

Jack Reakoff
Chair, Western Interior

Robert "Charlie" Wright, Sr.
Chair, Eastern Interior

cc: Federal Subsistence Board
Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

PC496

Submitted by: Chris Westphal
Community of Residence: Meadow Lakes

My submission is in respect to trawling. Trawling is destroying our fisheries, and the seabed ecosystem. the term "bycatch" needs to be replaced to WANTON WASTE. The amount of fish that is destroyed while targeting pollock is criminal to say the least. This type of fishing is not sustainable in any fashion and has been banned in many other parts of our country. We are not allowed to catch even one single King salmon where I live and have not been allowed for years. Trawling needs to stop in ALL Alaskan waters, state and federal. PERIOD. No mid water OR bottom trawling. It will take decades for mother nature to repair the damage that has already been done. Thank you for reading this. All I want is for my Grandchildren to have a chance to fish and their children to be able to fish. perhaps potfishing for pollock is the answer. Trawling must be banned.

PC497

Submitted by: Taylor White
Community of Residence: Sitka

I respectfully submit the following comments regarding Proposals 163, 164, and 165 addressing groundfish trawling in Alaska state waters. I support all three.

Bottom-contact trawling is a fishing method that disturbs and alters the structure of seafloor habitats. Complex seafloor habitats are essential for juvenile groundfish, forage species, and invertebrates, as they offer shelter, feeding grounds, and settlement sites for new individuals. Repeated trawling simplifies these habitats and favors disturbance-tolerant species.

When large-scale habitat complexity is reduced, ecosystem functions may be altered in ways difficult to reverse. Therefore, management considerations must extend beyond stock status alone. Even if target biomass levels remain within regulatory thresholds, habitat degradation can undermine future productivity and ecosystem resilience. The incentive structure of trawling, which maximizes bottom contact for catch efficiency, creates inherent tension between economic optimization and habitat conservation, as well as challenges for compliance and enforcement.

Testimony from the North Pacific Fishery Management Council and the trawl fleet indicates that gear labeled as pelagic trawl frequently contacts the seafloor, sometimes between 40 and 100 percent of the time. This underscores the difficulty of distinguishing between pelagic and bottom trawling impacts in the absence of clear and enforceable regulations.

It is essential to establish enforceable limits on seafloor contact and ensure transparent monitoring. Clear regulations, reliable data on gear usage, and robust monitoring systems are necessary to ensure compliance. Without these measures, the regulations may fail to provide effective environmental protection.

Salmon excluder devices should also be required and closely monitored to help protect commercial salmon species, which are vital to Alaska’s economy and coastal communities.

Given that Alaska fisheries management adheres to the precautionary principle, I urge the Board to prohibit bottom-contact groundfish trawling in state waters. At a minimum, any authorized trawl activity should include enforceable seafloor contact limits, transparent monitoring, and robust bycatch reduction measures.

Thank you for considering these comments.

PC498

Submitted by: Clifford Williams
Community of Residence: Yakutat Alaska

I do subsistence fishing every year for our family and elders and for the community of Yakutat and if you take it away from us it would not be fair to the community of Yakutat because we live off our land and if you give it to the sports fishermen and let them take what they want and let them take our king salmon away from us even that is not fair

---

PC499

Submitted by: Anitra Winkler
Community of Residence: Kodiak

Board of fish members,

My name is Anitra Winkler. I am a lifelong Alaskan and Kodiak fisherman. I am writing to voice my support for proposal 167. I have been fishing around Kodiak since 2010 and while I've only participated In the jig fishery the past three seasons the recent issues with cheating in the fishery is very obvious. Jigging is the last open fishery and is great opportunity for young fisherman as you don't need to buy an expensive permit, gear overhead is manageable, and you can do it with minimal crew and a wide variety of boats. I believe it is critical to protect this fishery for younger/new entrants and a great start would be to have more clear regulation on what gear is allowable. The critical thing that needs to be achieved is that cod sold as jig cod is caught on a jig machine not with other gear types I.e. longlines or pots.

PC500

Submitted by: Philip Winrod
Community of Residence: Thorne Bay

I oppose proposals 170, 171, and 172.

A lot of science has gone in to where we are now. The system works and supports a lot of biodiversity. Let's work together and find a better solution before cutting production.

PC501

Submitted by: Robert Wolfe
Community of Residence: Girdwood

My name is Robert Wolfe and this will be my 46th year in the Cook Inlet Salmon Fishery. I drift gill net and am based out of Homer where I have a Direct Market. I process and sell my fresh, frozen and smoked catch to locals and tourists.

I oppose proposal 186. it is based on faulty and misleading information.

The question asks; What is the issue you would like the Board to address and why?

Response:" Since the federal EEZ drift gill net fishery has started, allowing 200 fathoms(1,200') of gill net per drift permit holder...

I must stop here and correct for the record that: The law allows 150 fathoms(900') of gill net per Upper Cook Inlet Drift CFEC permit not 200 fathoms.

For over a decade regulations passed by the BOF for conservation and economic efficiency have allowed the Stacking of permits, two permits are allowed on one vessel. The regulation only allows 50 fathoms(300') of extra

gill net on that vessel for a total of 200 fathoms. Any 200 fathom drift net fishing in Cook Inlet is a reduction of 600' of gill net from the fishery. It's nothing new and is an actual conservation mechanism for the fishery.

In response to ACR 5 Staff finds there is no fishery conservation or reason for this out of cycle proposal . Staff does not find error in regulations and Staff finds no unforeseen effects from when the Stacking permits was adopted. The use of 200 fathom nets has been in practice for over a decade, even in "EEZ" and is not proven to be the recent cause of any low escapement numbers of Northern bound Coho.

Staff : "Both the Deshka and Little Susitna river Coho salmon weirs have experienced flooding or early ending of the project due to funding. Because of that, these counts are considered minimum or incomplete estimate of Coho salmon in river abundance. Deshka River Coho salmon weir counts have been incomplete each year since 2020. Little Susitna River Coho salmon weir counts have been incomplete since 2022. Fall weather and high water make consistent operations theses weirs difficult. Despite incomplete counts the most recent seasons have been generally categorized as low abundance for Coho in the Deshka and Little Susitna rivers." I will point out the 2024 Coho numbers were well below normal STATEWIDE. Not very good science to use implementing a permanent restrictive measure in a fishery that experienced historic over escapements last season.

This proposal attempts to implement several new restrictive regulations out of cycle based on a faulty understanding of stacking permits and uses the "new" EEZ fishery management as an excuse to close more area without any science to back it up.

The author highlights the management shift of more harvest to State waters is suspect for the decline. The statement "harvest in State waters offshore" is miss-leading. Harvest happens in select areas most of which are inshore close to the rivers in the northeastern area.(expanded Kenai and Kasilof corridors and Area 1) Today the fleet is congested into these smaller areas closer to the Mat-Su. When the mixed stock are harvested in a smaller areas up north the likelihood of excessive harvest of north bound Coho might increase but there is a lack of scientific data.

To us Cook Inlet Drift fishers, offshore is the Middle rip. This Geo-physical feature stretches from the Anchor Point line to north of Nikiski. This tidal feature is the main migration route for the Cook Inlet Salmon run and our most productive water. Years ago with Inlet wide openings the fleet would be stretched for 50 miles along this thin strip of tide rips from Kenai to Anchor Point spreading out the harvest area of this mixed stock run. This spreading out of the fleet helped keep the fleet from targeting any one specific area/stock on any given day. Putting the fleet in a concentrated area in the norther inlet for the majority of the seasons harvest has effectively put more pressure on north bound Coho.

Mixed stocks swim together and do not magically separate at a specific spot. Salmon do not recognize boundary lines drawn on a map. Tides and wind have the greatest impact on fish movement and patterns. North bound Cohos will be harvested alongside Sockeyes no matter what area is fished. More will be harvested the closer the fleet comes to the parent river.

In all reality we need more time in the very area proposed to be closed in able to harvest the surplus available in most runs. This is especially true for the EEZ waters farther from the Northern District, Kasilof and Kenai rivers.

This Board of Fish should not restrict more time in Area 1. Present management resulted in a waste of $ 50 million last year alone by causing twice the escapement as the Exxon Valdez Disaster.

This Board needs to allow for more time in Area 1 to avoid another blowout over escapement year and massive waste of the surplus resource. With another excellent forecast let's put the money from millions of surplus fish into the bank accounts and communities of Cook Inlet instead of letting 5 million fish rot in river.

I oppose proposal 186 and encourage you to educate yourselves on the enormous failure that is present Cook Inlet Salmon Management and reflect on how badly it has damaged people and our communities. You are the stewards of the resource and with all due respect this fishery is not being managed well.

Thank You for your time.

Bob Wolfe

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Kyle Woolever, and I live in Kodiak, Alaska. I am a community member who works in conjunction with local hatcheries and an avid fisherman. I am commenting on behalf of myself and the Kodiak fishing community I am part of.

If Proposals 170–172 are enacted, they will directly affect my family's ability to maintain a stable household income. Our livelihood depends on the direct employment supported by current production costs. A 25% increase in the cost per unit would significantly reduce the funds available to support my position as well as those of my coworkers in essential support roles. If these proposals pass, the resulting financial strain may eliminate the primary income our family relies on. Unfortunately, this would likely force us to leave our newly established residency in Kodiak, as we would no longer be able to sustain living here without that primary source of employment.

Coming to Kodiak, I quickly came to understand how essential hatcheries are to the livelihood of the local fishing community and to Alaska as a whole. Hatcheries play a critical role in maintaining the economic stability of what is effectively Alaska's second-largest export. Their operation supports not only fishermen, but also processors, suppliers, service industries, and the many families whose income depends on this broader economic ecosystem. When discussions arise about reducing, restricting, or effectively "hog-tying" hatchery operations—as these proposals would do—it is important to recognize what that truly means. These measures set the stage for the long-term dismantling of Alaska's hatchery system, despite little to no scientific evidence justifying such drastic action, and often relying on selective or misinterpreted data. Hatcheries were originally established to prevent the complete collapse of fisheries, and they succeeded. They continue to provide stability during years of low wild returns, helping protect both the fishing resource and the communities that rely on it. Undermining hatcheries now jeopardizes decades of progress, and threatens both economic and ecological stability across the region.

By passing any of these proposals, you cast doubt upon more than 70 years of adaptive management strategies employed by ADF&G and the scientific foundations that support Alaska's fisheries decisions. Alaska's fisheries have long been recognized globally as some of the best-managed fisheries in the world, a reputation built on rigorous science, continuous monitoring, and evidence-based decision-making. Implementing arbitrary reductions such as those outlined in these proposals would represent a troubling shift away from science-driven management toward emotion-based policy. This not only undermines the integrity of the

management system but also risks destabilizing a framework that has proven effective for decades in sustaining fish populations, supporting commercial and subsistence harvesters, and protecting Alaska's broader economic and ecological interests.

By preemptively passing these proposals, there would be a clear disregard for the scientific method and for the ongoing data collection that is essential to responsible fisheries management. Instead, such action would signal a willingness to rely on a shortcut driven by oversimplified assumptions and pressure rather than evidence-based analysis. Our leadership should inspire public confidence by demonstrating that their decisions are grounded in sound, verifiable facts, not spur-of-the-moment reactions. Anything less shifts the burden onto regional planning teams, who would be left to clean up the consequences of decisions made without due diligence.

Recent fluctuations and declines in wild salmon returns across the state are not the result of Alaska's hatchery programs, which have operated at stable production levels for roughly 50 years. If these proposals rely on the logic of correlation without causation, then one could just as easily argue—incorrectly—that the strong rebound in many wild stocks shortly after hatcheries were first established must mean hatcheries caused those increases. That, of course, would be an equally flawed conclusion. When attempting to understand why something is occurring, the responsible approach is to examine what has actually changed, not to impose causation based on the loudest voice or the most politically charged narrative. Ocean conditions, climate variability, predation shifts, and large-scale environmental changes have all been widely recognized as major drivers of salmon survival, far more than long-established hatchery outputs. To blame hatcheries—without credible scientific evidence and despite decades of stable production levels—misdirects attention away from the true variables affecting wild returns.

By entertaining the hypotheses promoted by anti-hatchery advocates, we risk making a far greater ecological gamble than many realize. Alaska's non-profit hatcheries may soon be one of the only tools capable of restoring declining wild stocks across the state. As environmental pressures intensify—changing ocean conditions, shifting predator dynamics, and climate-driven variability—the importance of maintaining the technical expertise, infrastructure, and capacity that hatcheries provide becomes even more critical. If hatchery production is reduced or effectively "hog-tied," we risk losing the very knowledge base and operational capability that will be essential when the current anti-hatchery hypothesis is ultimately proven wrong. Once that institutional and biological expertise is lost, it cannot simply be recreated overnight. Dismantling or weakening hatchery programs now would leave Alaska without one of its last remaining safety nets—a proven tool that has supported the stability of fisheries for decades and may be indispensable for rebuilding future wild stocks.

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

Alaska's hatchery system is already governed by a science-led, permit-based, adaptive management framework administered by the Alaska Department of Fish and Game (ADF&G).

Hatchery production levels are not discretionary; they are established through permits, reviewed continuously, and adjusted when data demonstrate a need. Proposals 170, 171, and 172 do not respond to a failure of that system. Instead, they impose across-the-board reductions or freezes based on generalized concern and unresolved scientific questions. This approach contradicts Alaska's long-standing fisheries management model, which relies on measured response to observed impacts, not speculative harm.

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

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

Sincerely,

Kyle Woolever
Kodiak, Alaska
[redacted]

Submitted by: Max Worhatch
Community of Residence: Petersburg, AK

I am opposed to Proposals 170, 171,172. These proposals are beyond the scope and responsibility of the Board of Fisheries, as there is currently a public process in place for this very purpose. Enhanced salmon are vital to coastal communities, as they provide economic benefits to both the commercial and sport sectors, as well as subsistence opportunity.

Proposal 170 would have a direct detrimental impact on my business. A 25% reduction in chum production would impact hundreds of commercial fishing families, regional and PNP employee families, and processing employee families. These families are the foundation of our communities. They put kids in our schools, volunteer for service to these communities, sit on our borough assemblies, and sit on our local Advisory Committees.

Proposal 171 while I cannot say that this proposal would impact my operations or the community I live in, this proposal would impact others within the region of the proposed actions. For that reason alone, I would oppose, but if adopted, this would give what I consider an unqualified and politically driven board the ability to arbitrarily change permitted releases. The precedent would cause instability to communities and industry, as a slew of proposed changes would likely be brought forth to subsequent meetings.

Proposal 172 This proposal would not necessarily directly impact my livelihood, adoption, again, would set a precedent of hatchery production being permitted in a highly political venue rather than one that is driven by science, knowledge of the subject, and reason.

Wrangell-St. Elias National Park
Subsistence Resource Commission

[redacted]
Copper Center, AK 99573

February 28, 2026

Chair Märit Carlson-Van Dort
Board of Fisheries
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526

Subject: Wrangell-St. Elias Subsistence Resource Commission comments on Board of Fisheries proposals

Dear Chair Carlson-Van Dort:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. It is comprised of local residents who make their living from the land. We appreciate the opportunity to comment on the Statewide Finfish and Supplemental Issues proposals.

Proposal 162: Support. There are concerns with paying for commercial services in a subsistence fishery. Subsistence users do not pay someone to take them out to fish because they know how to get out to their fishing areas. Transporters in the subsistence fishery are not regulated and there are concerns about proper enforcement. While the SRC overall supports this proposal, there are concerns that this is a statewide proposal and not targeted at local concerns on the Copper River.

Proposals 163-165: Support. These proposals all change the gear to support less destructive trawling. There is concern about scraping the sea bottom and the consequential bycatch. Species get decimated because trawlers are catching them small and young. The trawl fishery needs to be managed and regulated. These proposals are a step in the right direction.

Proposal 175: Support with modification. The SRC modified the original proposal to "bag may be constructed of webbing that doesn't exceed a stretched measurement of 3.5 inches for harvesting salmon." The SRC appreciates the proposal for supporting Chinook salmon. By returning more Chinook into the rivers by reducing mortality via dipnet, situations like what

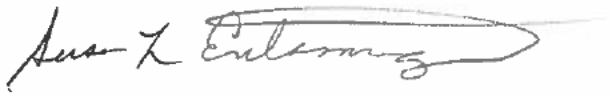
Chair: Susan L. Entsminger; Members: Bruce Ervin, Mercedes Starr Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens. Alternate: Edward GreyBear

happened on the Yukon can be avoided in rivers that still have harvestable Chinook runs, like the Copper River. However, making 3.5 inches for all fish species will impede harvest of other non-salmon species, such as whitefish. If applicable, this proposal should be species specific.

Proposal 181: Oppose. The SRC felt this proposal was very ambiguous. If the goal of the Department of Fish and Game is to not allow remote-controlled gear, the proposal should be rewritten to clearly state that prohibition. As it is written now, it is unclear whether fishing methods such as tip-ups would be allowable if this regulation went into effect. Those fishing methods should not be restricted. The SRC encourages the Department of Fish and Game to send in a rewritten proposal aimed at prohibiting remote-controlled gear.

Thank you for the opportunity to comment.

Sincerely,



Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Chair: Susan L. Entsminger; Members: Bruce Ervin, Mercedes Starr Knighten, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, and Daniel E. Stevens. Alternate: Edward GreyBear

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Charles Y, and I am a Southeast Alaska salmon harvester. I operate the F/V Cape Caution.

I am writing to urge the Board to reject Proposals 170, 171, and 172. On years when natural runs are not strong, hatcheries provide opportunity to harvesters and processors. They are an important economic buffer for the salmon industry.

These proposals would bring more economic instability for everyone involved in the salmon industry in Southeast Alaska. The reduction or elimination of hatcheries does not only affect the fishers and processors and sport fishermen, but all the allied businesses that support the fleet.

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

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

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

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

Sincerely,

Charles Y
Southeast Alaska

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Sergey Yakunin, and I am a commercial fisherman in Prince William Sound, Alaska. Fishing is my one and only source of income. I operate the F/V Silver Storm.

I am writing to urge the Board to reject Proposals 170, 171, and 172. These proposals would be devastating. Four out of five hatcheries have not been profitable in the last six years. Any reduction will kill the main season in Prince William Sound.

I am not sure we will survive. With how expensive it is to operate a seiner, we will definitely be in trouble finding crews if production is cut further.

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

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

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

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

Sincerely,

Sergey Yakunin
Prince William Sound, Alaska
[redacted]

YAKUTAT
Lost Coast Wild
Alaska Salmon
Seafoods

February 9, 2026

Ms. Märit Carlson-Van Dort
Alaska Board of Fisheries
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: Opposition to Proposal 187

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

I write in strong opposition to Proposal 187.

Yakutat Seafoods purchased gillnet-caught coho salmon harvested from the Tsiu River from 2005 through 2014, averaging more than 40,000 fish annually. During that period, the Tsiu River fishery accounted for over 60 percent of the total salmon volume landed at our plant each year. Despite this level of commercial harvest, the Tsiu River consistently met its established sustainable escapement goal during those years.

According to the Alaska Department of Fish and Game, escapement goals in the Tsiu/Tsivat system have continued to be met through 2025. There has been no demonstrated conservation or biological emergency. Reduced commercial harvest in recent years reflects reduced fishing effort and logistical limitations — not diminished stock productivity or escapement failure.

In 2015, a significant channel shift in the Tsiu River flooded the landing strip used to land DC-3 aircraft for fish transport. As the Board is aware, the Tsiu, Tsivat, and Kaliakh river systems are highly dynamic and have historically shifted channels and altered access conditions. The

cessation of Yakutat Seafoods' purchases from the Tsiu was driven by access constraints, not conservation concerns.

If river conditions shift again and access is restored, we would evaluate resuming purchases and air tendering fish to Yakutat, as was successfully done for many years.

Proposal 187 does not identify:

1. An immediate conservation or biological emergency;
2. A regulatory error or omission; or
3. An unforeseen effect of existing regulation.

The department has successfully managed this terminal system for decades using existing emergency order authority. The commercial set gillnet fishery has functioned as an important inseason management tool, allowing managers to regulate escapement and respond to changing conditions. Eliminating this fishery removes that management tool without proposing any alternative escapement control mechanism.

Department reporting indicates that while commercial participation has declined, sport fishing effort in the system has increased. Proposal 187 proposes no corresponding conservation measures or effort adjustments for other user groups. Closing only the commercial fishery assigns the full allocative burden to the resident commercial fleet without addressing total removals across all sectors.

This proposal is allocative in nature. It permanently eliminates a historically sustainable commercial opportunity in a system that has met escapement objectives for decades.

The Tsiu River fishery has long supported resident permit holders from Yakutat and Cordova, including Alaska Native fishermen, and has provided meaningful late-season income stability for small-boat operators. In strong years, Tsiu harvests have represented a substantial portion of the Yakutat Area set gillnet coho portfolio. Removing that opportunity undermines fleet stability and processor viability without conservation justification.

As a 38-year resident of Yakutat with extensive knowledge of this area and its harvest history, I respectfully urge the Board to reject Proposal 187.

Thank you for your consideration.

Sincerely,
Greg Inderland
Manager, Yakutat Seafoods

Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 786-3888, Fax: (907) 786-3898
Toll-Free: 1-800-478-1456

In Reply Refer To
OSM.R26022

February 25 2026

Märit Carlson-Van Dort, Chair
Alaska Board of Fisheries
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Carlson-Van Dort,

I write on behalf of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council (Council) to provide comments on Alaska Board of Fisheries proposals being considered at the upcoming Statewide Finfish Meeting.

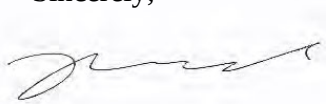
The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Yukon-Kuskokwim Delta Region. It was established under the authority of Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their region that may impact subsistence resources critical to communities it serves.

The Council held a meeting January 20-22, 2026, in Bethel and voted to submit the following comments.

The Council supports Proposals 163, 164, and 165. Our Council agrees with the other Yukon River Councils that efforts to better regulate trawl fisheries are long overdue. It is important to protect salmon at all their life stages, as well as their marine habitat. These proposals will help clarify definitions, establish monitoring standards, reduce bottom contact and subsequent habitat destruction, and require the use of salmon excluders, an approach already used in other fisheries to reduce salmon bycatch.

Thank you for considering our comments on the above proposals. If you have any questions or would like to follow up, please contact us through our Subsistence Council Coordinator Brooke McDavid at [redacted] or [redacted]

Sincerely,



Jacqueline Cleveland
Chair

cc: Federal Subsistence Board
Yukon-Kuskokwim Delta Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Aaron Poetter, Federal Subsistence Liaison, Alaska Department of Fish and Game
Administrative Record

PC509

Submitted by: Dennis Zadra
Community of Residence: Cordova

I would like to show my support for Proposal 162, 163, 164, 165 and 169 as these are common sense. I am adamantly opposed to Proposals 170, 171 and 172 because of the broad consequences these would have across the State and the lack of scientific justification to support them. I am also adamantly opposed to Proposals 186 and 187 because of the extremely allocative issues they bring forward.

March 2, 2026

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

Dear Members of the Board of Fisheries:

My name is Brian Zwick, and I am a commercial fisherman, local business owner, subsistence user, sport fisherman, and community member in Southeast Alaska. I operate the F/V Kiro under View Alaska LLC.

I am writing to urge the Board to reject Proposals 170, 171, and 172. Our salmon numbers are declining every year due to the impact of extreme overfishing in the trawl fisheries. As small-impact fishermen, we are suffering more every year, and over the last few years, if it were not for the hatcheries and their production of stocks, we would be bankrupt and unable to sustain our way of life and support our families.

These proposals would put an end to commercial salmon fisheries sustainability for all salmon groups. Reducing egg takes will result in fewer stocks, and it will not be sustainable for hatcheries to operate or for fisheries to remain viable.

This will end up shutting down the hatcheries due to lack of funding, and once they shut down, the cost to reopen them is unobtainable. I am deeply concerned about making permanent reductions before the completion of ongoing Alaska hatchery research.

There are sea lion rookeries at hatchery locations that did not exist prior to the hatcheries. If you reduce production or close them down, the impact on wild stocks will be devastating and irreversible.

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

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

Proposals 170, 171, and 172 seek to impose broad, preemptive reductions or moratoria on Alaska's private nonprofit (PNP) salmon hatchery program without demonstrating a causal link between hatchery production and the specific conservation concerns they claim to address.

Collectively, these proposals abandon Alaska's science-based, adaptive management framework in favor of blanket regulatory actions that would undermine fisheries stability, harm coastal communities, and set a dangerous precedent for decision-making absent demonstrated necessity.

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

Sincerely,

Brian Zwick
Southeast Alaska
[redacted]