

RC0037

Matt Haakenson
PO Box 751
Anchor Point, AK
99556

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RE: Proposal 22

Chairman Morisky, Members of the Alaska Board of Fisheries,

There are several points regarding Proposal 22 specifically, and some of the other hatchery related proposals, in general, which I would like to address.

The first point that I would like to address is the stated intention of Proposal 22. Discussing the proposal, in the committee of the whole, it was stated that Proposal 22 was based on a concern of one private property owner, regarding carcasses which washed ashore near his property. If this is the case, the proposal would have a rather adverse effect on the desired outcome. If the cost recovery harvest was limited to a certain number of fish, the result would be that more fish would end up washing ashore.

Several other points are inter-related practical and logistical concerns about limiting the hatchery associations to harvest only a certain number of fish to recover their costs. I do not believe there is a precedent for it. Processing companies do not commonly purchase or sell by number of fish, but rather, by poundage. The variation in fish size can have a profound effect on the value, as well as the cost of processing the product. For instance, the weight of pink salmon commonly varies between two pounds and ten pounds, with a greater difference at the extreme. Even considering a more likely range of three to four pounds, that is a difference of a third more. From the processing perspective, it takes as much time and money to process a small fish as it does a large one. The machines run at a set rate, taking the same amount of time to fillet a two pound fish or a ten pound fish. Prices also vary as markets fluctuate daily. In the commercial fishery, pink salmon prices have bounced between twenty cents and forty cents per pound, or more, over the past five years, as markets changed, and supply surged or dwindled. Can you imagine bidding competitively to purchase a product that you cannot accurately value or quantify until after the fact? Bids for cost recovery fish are highly competitive, and exceed the prices paid in the common property commercial harvest.

Hatchery associations operate within a budget. They need a certain amount of money to fund their operations. These operations benefit the people of the state for the common good. The associations do not profit from it. There has been a lot of talk about what the balance is, between the common property and cost recovery harvest. CIAA funds, and actively participates in habitat restoration and pike and elodia remediation. Many people benefit from the projects they do, including, or

completely aside from, their hatchery operations. What value should we place on the sockeye harvested in the China Poot Bay personal use fishery, or the salmon which only return to their native streams and spawn because of the successful pike eradication done by CIAA? How do we enumerate, or place a value on the common property harvest of those fish? As a reminder, common property does not mean only commercial harvest, but also includes recreational, subsistence, and personal use. The hatcheries' cost recovery harvests aren't only used to pay for operating the hatcheries; it helps cover the costs of all their operations.

It is not practical to mandate that one of the hatcheries, or any of them, be limited to a certain number of fish for cost recovery. It wouldn't make sense to limit it to a specific number of pounds, either, since the market may vary in price by as much as fifty to one hundred percent from year to year, and because returns also vary greatly. The current and historical practices for the timely and efficient harvest of the cost recovery fish, and the determination of the harvest size, are proven and effective methods.

I'd like to thank the members of the Board for taking the time to consider these comments, and for taking a key role in the effective management of our fisheries. Your time and efforts are greatly appreciated. You have my respect.

Matt Haakenson