

**Fairbanks
Fish & Game Advisory Committee**

**Interior Region
Fish & Game Advisory Committees**

Kirk Schwalm
Chairman
PO Box 83825
Fairbanks, AK 99708

Central
Delta Junction
Eagle
Fairbanks
GASH
Koyukuk River
Lake Minchumina
McGrath

Middle Nenana River
Middle Yukon River
Minto-Nenana
Ruby
Stony Holitna
Tanana-Rampart-Manley
Upper Tanana Fortymile
Yukon Flats

**Alaska Board of Fisheries Hatchery Committee of the Whole
March 23, 2022**

**Comments related to management of PNP (Private Non Profit) hatcheries
Submitted by: Fairbanks Fish & Game Advisory Committee
March 14, 2022**

The Fairbanks Advisory Committee (FAC) respectfully submits the following comments to the Alaska Board of Fisheries for consideration at the March 23, 2022 BOF Hatchery Committee meeting.

Fairbanks Advisory General Concerns in Regard to Hatchery Production

The Fairbanks Advisory Committee (FAC)

- (1) Supports the Alaska Constitutional mandate under Article 8 to manage Alaska fisheries for
 - a. The utilization, development, and conservation of all natural resources belonging to the state, including land and waters, for the maximum benefit of the people.
 - b. Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use
 - c. Fish, forests, wildlife, grasslands, and all other replenishable resources belong to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.ⁱ
- (2) Supports fair access for subsistence, personal use and sports fisheries
- (3) Supports the intent of the Alaska Sustainable Salmon Policy and the intent of “precautionary principles” in salmon management
- (4) Is concerned about the general decline in run strength and size of wild salmon stocks in Alaska, specifically Chinook and chum salmon in the BSAI and GOAⁱⁱ
- (5) Recognizes that there is growing evidence of negative impacts of current levels of anadromous salmon hatchery productionⁱⁱⁱ on wild stocks of the North Pacific^{iv}
- (6) Supports increased funding for fisheries research into causes of salmon declines, including the impacts of anadromous hatchery salmon on wild stock such as:
 - a. Hatchery fish production creating competition for forage food with wild stocks
 - b. Expanding the current locations for research on hatchery straying into wild streams and the genetic mixing of hatchery stocks with wild stock
 - c. Examining the correlation of increased hatchery stock harvest on exploitation of stocks at risk in time and area
 - d. Examining predation of hatchery fish on wild juvenile salmon stocks^v

- (7) Seeks a better understanding of how PNP hatcheries operate and benefit Alaska through a cost-benefit analysis, including wild stock management

The Fairbanks Advisory Committee recommendations for BOF Hatchery Committee meetings

The FAC believes that even though the Alaska Board of Fisheries Hatchery Committee has limited regulatory oversight of PNP (private non-profit) hatchery production^{vi}, it is the only stated venue for public discourse on hatchery issues. Further, after being originally established in 1999, adopting Joint Protocols^{vii} with the Alaska Department of Fish and Game in 2002 and reaffirming annual meetings, the committee *did not meet again until 2018*.^{viii} With concern over the future of the Hatchery Committee, the FAC recommends that the BOF Hatchery Committee:

- (1) Be held at least annually in perpetuity
- (2) Provide real-time audio and visual available to the public
- (3) Provide for public participation in the form of questions and comments, managed by specific criteria to allow for fair and balanced consideration
- (4) Fully record and archive all Hatchery Committee meetings for public access
- (5) Consider an independent Scientific Review Committee to assess all issues related to potential hatchery impacts on wild stock, and to report, on an annual basis, their recommendations and literature search findings

The Fairbanks Advisory Committee recommendations for annual reporting

As the Board of Fisheries has authority to regulate egg take in hatchery production, the FAC requests the following as annual reporting from the ADF&G through the Board of Fisheries Hatchery Committee to include:

- a. *Compilation of broodstock/ egg production by year per individual hatchery* and compared to each hatchery's annual management plan for broodstock production
- b. percentage of hatchery return that goes to cost recovery by year per individual hatchery by species, paying particular attention to areas that have a very high rate of cost recovery, such as Tutka Bay where the rate is over 85% .

Further, the FAC requests

- c. explanation of how each hatchery harvests cost recovery
- d. detail within each RAA (regional aquaculture association) percentages of subsistence, personal use and sports exploitation
- e. detail percentage and numbers of fish within each RAA of commercial common property exploitation per gear type

These reports will enable the public, including the Alaska Legislature, in further understanding what each hatchery utilizes in hatchery returns for cost recovery, broodstock and commercial common property, subsistence, sports and personal use harvest rates.

Sincerely,

/s/ Kirk Schwalm

Kirk Schwalm

Chair Fairbanks Fish & Game Advisory Committee

ⁱ *Constitutional Authority* Unlike many states in the union, Alaska enshrined its regard for natural resources in its constitution. [Article 8 — Natural Resources](#) lays out the framework for management of renewable resources: <https://www.adfg.alaska.gov/index.cfm?adfg=process.commissioner>

ⁱⁱ Bering Sea/ Aleutian Islands and Gulf of Alaska

ⁱⁱⁱ This does not apply to non-anadromous release hatchery production

^{iv} “The overall impact of hatchery fish can be divided into three broad categories. First, over-harvest of wild stocks in mixed stock fisheries can have a profound impact on survival of wild stocks. When abundant hatchery stocks are targeted for high harvest, less abundant wild stocks cannot withstand the high exploitation rates, resulting in under-escapement of wild fish. Second, there are a number of detrimental ecological interactions that can take place between hatchery and wild fish. These can take the form of competition for food and territory, predation by larger hatchery fish preying on smaller wild cohorts, and negative social interactions when large numbers of hatchery fish are released on top of small numbers of wild fish. Third, there is a series of genetic risks associated with hatchery rearing. Where hatchery operations conflict with recovery of ESA-listed stocks the options appear to be either, 1) isolation of hatchery production (e.g., near-tidewater rearing/release and terminal harvest), or 2) altering hatchery operations to include a conservation mandate.” NOAA Technical Memorandum NMFS-NWFSC-XX “ECOLOGICAL AND BEHAVIORAL IMPACTS OF ARTIFICIAL PRODUCTION STRATEGIES ON THE ABUNDANCE OF WILD SALMON POPULATIONS : A Review of Practices in the Pacific Northwest . 1997 Thomas A. Flagg, Barry A. Berejikian, John E. Colt, Walton W. Dickhoff, Lee W. Harrell, Desmond J. Maynard, Colin E. Nash, Mark S. Strom, Robert N. Iwamoto, and Conrad V.W. Mahnken . National Marine Fisheries Service Northwest Fisheries Science Center Resource Enhancement and Utilization Technologies 2725 Montlake Blvd. E., Seattle, WA-98112-2097

^v And other prey species in localized areas, such as shellfish consumed by hatchery pink salmon in Tutka Bay, where 100million pink fry a year are released to feed in a small lagoon within a state park and critical shellfish habitat area.

^{vi} AS 16.10.430 / 5 AAC 40.240 / 5 AAC 40.860

^{vii} June 28, 2002 Joint Protocol between the Alaska Board of Fisheries and the Alaska Department of Fish and Game: “The joint department-board meeting on hatchery described here will take place at a mutually agreeable time and place during regularly scheduled meetings of the board. The meetings will provide a forum for open discussion on a mutually agreed agenda of hatchery topics. The agenda may include site-specific as well as regional or statewide hatchery issues. These salmon enhancement meetings will not be open for regulatory actions and no hatchery-related petitions or agenda change requests (ACRs) will be considered as action items. These meetings are open to the public. At its discretion and upon appropriate notice, the board may open the meeting to public comment... The hatchery meetings will provide an opportunity for the board and the public to receive reports from the department on hatchery issues including: production trends, management issues, updates on hatchery planning efforts, wild and hatchery stock interactions, biological considerations and research. Requests for report from the department may be made during the board’s work session during meeting years when there is a hatchery forum scheduled.... As appropriate, the board and department may agree to invite other state and federal agencies, professional societies, scientists, or industry spokespersons to attend and to contribute information particular topics or sponsor other discussions, such as marketing or intrastate effects.”

^{viii} The Hatchery Committee met in 2019 and 2020 but not in 2021 because of COVID restrictions.