

## ***Commercial (salmon) (10 proposals)***

### **PROPOSAL 34**

#### **5 AAC 21.3XX. NEW SECTION.**

Create a Kamishak Bay Purse Seine Fishery Management Plan as follows:

CREATE The Kamishak Bay Purse Seine Fishery Management Plan to structure guidelines in regulation to ensure wild fish priority in mixed stock fisheries to surrounding river systems

#### **5 AAC 21.3XX. Kamishak Bay Purse Seine Fishery Management Plan.**

(a) The purpose of this management plan is to ensure adequate escapement and a sustainable harvestable surplus of salmon into the Kamishak District drainages. This plan would acknowledge ecosystem management guidelines to the department to provide for other uses especially the McNeil River State Game Sanctuary and Refuge. The department shall manage the commercial purse seine fishery to minimize the mixed stock harvest of Kamishak District salmon to provide robust escapements and to provide a buffer to rivers in the Kamishak area.

The department shall manage the Kamishak District commercial purse seine fishery as described in this section.

**What is the issue you would like the board to address and why?** The McNeil River chum salmon has been a stock of concern since 2016. In 2022, the Kamishak Districts McNeil, Bruin, and Ursus Cove rivers are all low or below sustainable escapement goals (SEG). Pink salmon are also below SEG ranges in all three Kamishak Bay index systems, (Bruin River, Sunday, and Brown's Peak creeks). Sockeye salmon escapement to Mikfik Lake was below the minimum SEG.

ADFG Emergency Orders have been diligent to close the Paint River and adjoining McNeil River subdistrict stock of concern, however, EO's are also used to open areas drawing fishermen into these areas that may not realize conservation concern. A management Plan will give this area a base structure with guidelines to protect wild salmon populations. Chum harvest is erratic ranging from over 177,000 in 2004, 70,000 in 2010, 30,000 two out of the last five years. A regulatory Management Plan can create a guide between the public and the department. Harvests especially near SHA's overlap run timing between species and needs to be in regulation to protect wild salmon masked in mixed stocks.

Enhancement has exacerbated mixed stock fisheries. The Bruin Bay Subdistrict where many of these systems are below SEG, contains the Kirshner Lake hatchery SHA 249-72. Sockeye from the Trail Lakes Hatchery are remotely stocked in this lake primarily for an Exclusive CIAA corporate cost recovery. fishery. This area requires otolith sampling, evaluation, and guidelines in regulation to ensure wild fish priority to surrounding river systems. There is very little oversight in these areas and often fishers work in tandem to increase harvest.

The Paint River subdistrict contains a fish ladder immediately adjacent to McNeil River. Attempted enhanced stocking of various species since 1991 has met with little success. However, Paint subdistrict blocks McNeil 249-52 and is another potential of interception requiring preventative guidelines in regulation to prevent interception on wild systems especially McNeil

stock of concern. Since Annual Management Reports have been severely curtailed of content, A Management Plan can document managers knowledge of this area for future staff.

**PROPOSED BY:** Pioneer Alaskan Fisheries Inc. (EF-F23-117)  
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**PROPOSAL 35**

**5 AAC 21.XXX. The Kachemak Bay Wild Fish Priority Management Plan.**

Create a *Kachemak Bay Wild Fish Priority Management Plan* as follows:

**Utilizing Section 5 AAC 39.220 Policy for the Management of Mixed Stock Salmon Fisheries**

**Create 5 AAC 21.xxx. The Kachemak Bay Wild Fish Priority Management Plan.**

Accumulate and synthesize the stock specific data available from the collaborative of Research and Educational facilities available on the Kenai Peninsula and apply this to LCI

"Priority should be given to encouraging rehabilitation of depleted indigenous fish populations";  
"Recognize cumulative impacts when considering effects of small incremental developments and action affecting critical habitat resources.";

"protect natural substrate and aquatic vegetation...to maintain aquatic habitats." **5AAC 95.610**

(a) In applying this statewide mixed stock salmon policy for all users, conservation of wild salmon stocks consistent with sustained yield shall be accorded the highest priority.

(b) In the absence of a regulatory management plan that otherwise allocates or restricts harvest, and when it is necessary to restrict fisheries on stocks where there are known conservation problems, the burden of conservation shall be shared among all fisheries in close proportion to their respective harvest on the stock of concern. The board recognized that precise sharing of conservation among fisheries is dependent on the amount of stock-specific information available.

(c) The board's preference in assigning conservation burdens in mixed stock fisheries is through the application of specific fishery management plans set out in the regulations. A management plan incorporates conservation burden and allocation of harvest opportunity.

**What is the issue you would like the board to address and why? CREATE The Kachemak Bay Wild Fish Priority Management Plan** to structure guidelines for ADFG to acknowledge and document food web and natural trophic status in fish interaction and to focus on wild fish priority in mixed stock fisheries in surrounding river systems and their nursery estuaries.

In 1975 at no cost, before hatcheries the wild component of portfolio wild streams provided harvest of 844,125 pinks in the southern district. Even during low salmon abundance of 1960's and 70's still annually averaged 250,000 pinks for common property fisherman. For the last thirty years under hatcheries pink harvest averaged 60,000. Where is this wild fish component now?

Wild systems are below escapement goals:

### **Humpy Creek Barabara China Poot Port Graham**

**Escapement 2012 – 2019 50,000 11,500 3903**

**Escapement 2020 – 2022 1,800 5,492 153 606**

ADFG's performed 4-5 years of in season otolith sampling during harvest and found significant percentages of wild unmarked sockeye and wild unmarked pink salmon. Neither wild sockeye nor wild pinks are accounted for or documented in reports.

#### **Estimated wild sockeye component**

Sockeye purse seine averaged **49% wild**. This means for every 100,000 harvested, **49,000** are wild.

CIAA sockeye cost recovery, averaged **3.4% wild**, this means for every 100,000 harvested, **3,400** are wild.

#### **Estimated wild pink salmon component**

pink salmon **purse seine**, averaged **35% wild**, so every 100,000 scooped up, **35,000** wild migrating.

CIAA **pink salmon cost recovery** averaged **6.3% wild**, so every 500,000 scooped up, **33,150** are wild.

The 52,400 wild sockeye and 68,150 wild pink component remain **masked as nonexistent in this mixed stock hatchery/wild harvest**.

Like a ratchet that keeps tightening the pressure, hatchery production is leading to unsustainable fishing mortality rates for wild salmon. The mixed stock fisheries in the Southern District are not adequately acknowledged or monitored as there is no money. With priority focus on hatchery production for perpetual cost recovery, harvest rates are set related to total abundance of fish in an area; as if the wild fish were not there. If this area gets a Wild Fish Priority Plan, this focus can be shifted to state directive.

This plan can dovetail with the overlapping jurisdictions of the Legislatively Designated Kachemak Bay Critical Habitat, its Regulatory Management Plan Regulation 5AAC 95.610 and the Kachemak Bay State Park Management Plan for diversity and abundance of indigenous species of fish.

**Board Authority: AS 16.20.510. Regulations in Critical Habitat Areas.**

**Manage the Kachemak Bay to maintain wild fish priority.**

**PROPOSED BY:** Nancy Hillstrand

(EF-F23-157)

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**PROPOSAL 36**

**5 AAC 21.372. Tutka Bay Lagoon Salmon Hatchery Management Plan.**

Amend the Tutka Bay Lagoon Salmon Hatchery Management Plan as follows:

**5 AAC 21.372. Tutka Bay Lagoon Salmon Hatchery Management Plan.** (a) The department, in consultation with the hatchery operator, shall manage the Tutka Bay Subdistrict [AND PAINT RIVER SUBDISTRICT] to provide for common property fisheries and to achieve the hatchery broodstock and cost recovery goals set by the hatchery **Permit #32 conditions, goals, objectives, Basic Management Plan (BMP) addendum, and Service Agreement IHP-14-100, to: “produce revenues from the harvest and sale of returning fish that are at least equal to the costs of hatchery operation and operate efficiently so that at least 50% of the fish are harvestable by common property fisheries”**

**What is the issue you would like the board to address and why?** Like any other hatchery, the Tutka hatchery is required to follow the directives of its original signed Permit #32 and BMP that went through a lengthy public process allowing CIAA the privilege to operate a hatchery. Decades of chronic insolvency from poor decisions, does not give license to alter permit and BMP directives without public process, to self serve an exclusive cost recovery fishery. State money and efforts are better spent elsewhere than wasting time focused on cost recovery for one lone chronically insolvent company. This is not in the public interest.

CIAA has taken over 90% of the pinks with cost recovery averaging 500,000 pinks annually in the last 32 years. CIAA activities benefit only 1% of Area H permit holders and has chosen itself as the chief beneficiary. In 2022 only nine Area H limited entry permits fished in LCI. The remaining 99% of Area H permits are administratively excluded from any benefit from CIAAs activities. Even if CIAA adheres to the conditions objectives and goals of their permit, this is an exclusive fishery with special privileges that excludes the permit holders paying off the \$19,000,000 in loans with their enhancement tax harvest for inefficient aquaculture they get no use of.

**PROPOSED BY:** Pioneer Alaskan Fisheries Inc.

(EF-F23-145)

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**PROPOSAL 37**

**5 AAC 21.373. Trail Lakes Hatchery Salmon Hatchery Management Plan.**

Modify legal gear in the Trail Lakes salmon hatchery management plan as follows:

- c) Notwithstanding 5 AAC 21.320 and 5 AAC 21.330, and except as otherwise provided by emergency order issued under AS 16.05.060, the permit holder for the Trail Lakes Hatchery, and the permit holder's agents, contractors, or employees authorized under 5 AAC 40.005(g) may harvest salmon in the
  - (1) Bear Lake Special Harvest Area, from 6:00 a.m. May 15 until 6:00 p.m. October 31 using weirs, purse seines, hand purse seines, beach seines, **and drift gill nets;**

- (2) China Poot and Hazel Lake Special Harvest Area, from 6:00 a.m. June 1 until 6:00 p.m. July 31 using purse seines, hand purse seines, beach seines, **and drift gill nets;**
- (3) Tutka Bay Lagoon Special Harvest Area, from 6:00 a.m. June 1 until 6:00 p.m. September 15 using purse seines, hand purse seines, beach seines, **and drift gill nets;**
- (4) Kirschner Lake Special Harvest Area, from 6:00 a.m. June 1 until 6:00 p.m. August 15 using purse seines, hand purse seines, beach seines, **and drift gill nets;**

**What is the issue you would like the board to address and why?** Allow drift gill nets in SHA's of Lower Cook Inlet for cost recovery harvests. All commercial fishing gear types support salmon enhancement in Cook Inlet waters through the 2% enhancement tax on fish harvests. This proposal would allow gear types paying taxes for aquaculture to participate in the harvest of these enhancement fisheries which are primarily located in the LCI district. Mixed gear types currently fish together in Prince William Sound. This also would assist with cost recovery efforts on common property fishing days by allowing another gear type to harvest that may not have common property opening during that period.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (HQ-F23-057)  
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**PROPOSAL 38**

**5 AAC 21.330. Gear.**

Modify legal gear in Lower Cook Inlet special harvest areas as follows:

5 AAC 21.330 gear types

...

(b) Set gillnets may be used only in the following locations:

(1) Southern District:

...

**(F) SHA's and of LCI to Include China Poot SHA, Hazel Lake SHA, Tutka Hatchery SHA, Bear Lake SHA, Paint River SHA, Kirshner Lake SHA limited to cost recovery harvest only.**

**What is the issue you would like the board to address and why?** Allow set nets in SHA's of Lower Cook Inlet for cost recovery harvests. All commercial fishing gear types support salmon enhancement in Cook Inlet waters through the 2% enhancement tax on fish harvests. This proposal would allow gear types paying taxes for aquaculture to participate in the harvest of these enhancement fisheries which are primarily located in the LCI district. Mixed gear types currently fish together in Prince William Sound. This also would assist with cost recovery on common property fishing days by allowing another gear type to harvest that may not have common property opening during that period.

**PROPOSED BY:** Homer Fish and Game Advisory Committee (HQ-F23-111)  
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**PROPOSAL 39**

**5 AAC 21.350. Closed waters.**

Amend the list of waters closed to commercial fishing for salmon in Cook Inlet as follows:

5 AAC 21.350 is amended to read:

...

(d) Southern District

...

**(9) waters of Humpy Creek south of a line from 59° 40.10' N. lat., 151° 09.70' W. long., to 59° 40.10' N. lat., 151° 08.10' W. long., and east of a line at 59° 40.10' N. lat., 151° 09.70' W. long., to 59° 39.30' N. lat., 151° 09.70' W. long.;**

**(10) waters of Tutka Bay southeast of a line at 59° 25.51' N. lat., 151° 19.01' W. long., to 59° 25.14' N. lat., 151° 19.51' W. long.;**

(e) Kamishak Bay District

...

**(3) waters of Iniskin Bay north of a line from a point at 59° 43.85' N. lat., 153° 22.60' W. long., to 59° 43.85' N. lat., 153° 27.12' W. long., and east of a line from 59° 43.85' N. lat., 153° 22.60' W. long., to 59° 42.89' N. lat., 153° 22.60' W. long.;**

**(8) waters of Rocky Cove inshore of a line from 59° 26.98' N. lat., 153° 44.36' W. long., to 59° 26.37' N. lat., 153° 43.92' W. long.;**

**(9) waters of McNeil Lagoon and bay inshore of a line from 59° 7.52' N. lat., 154° 15.00' W. long., to 59° 07.40' N. lat., 154° 14.20' W. long.;**

**(10) waters of Bruin Bay inshore of a line at 59° 22.28' N. lat., 154° 04.95' W. long., to 59° 20.80' N. lat., 154° 04.95' W. long.;**

**(11) waters of Knoll Head Creek north of a line at 59° 37.80' N. lat., 153° 30.24' W. long., to 59° 37.80' N. lat., 151° 31.94' W. long., and west of a line from 59° 37.80' N. lat., 153° 30.24' W. long., to 59° 38.21' N. lat., 153° 30.24' W. long.;**

**(12) waters of Brown Peak Creek north of a line from 59° 32.60' N. lat., 153° 44.30' W. long., to 59° 32.60' N. lat., 153° 42.50' W. long.;**

**(13) waters of Amakdedori Creek west of a line from 59° 17.10' N. lat., 154° 07.10' W. long., to 59° 16.10' N. lat., 154° 07.10' W. long.;**

(f) Outer District

...

**(15) waters of South Nuka Bay east of a line from 59° 18.62' N. lat., 150° 42.86' W. long., to 59° 18.13' N. lat., 150° 43.11' W. long.;**

**(16) waters of James Lagoon west of a line from 59° 34.11' N. lat., 150° 23.04' W. long., to 59° 33.05' N. lat., 150° 24.74' W. long.;**

**(17) waters of Shelter Cove south of a line from 59° 17.30' N. lat., 151° 13.90' W. long., to 59° 17.30' N. lat., 151° 14.80' W. long., and west of a line from 59° 17.30' N. lat., 151° 13.90' W. long., to 59° 17.03' N. lat., 151° 13.90' W. long.;**

(g) Eastern District

...

**(4) waters of Aialik Bay and lagoon north of a line from 59° 52.58' N. lat., 149° 44.62' W. long., to 59° 52.75' N. lat., 149° 44.12' W. long.;**

**What is the issue you would like the board to address and why?** This proposal describes regulatory closed waters in areas previously identified using only physical markers. The regulatory marker program in Lower Cook Inlet ended in 2008. Following this, at the 2013 Alaska Board of Fisheries meeting, regulatory closed waters were established for sixteen areas that had previously been identified using physical markers. Some of these markers were referenced in regulation, other markers were not identified in regulation. Approximately a dozen markers that had not historically been identified in regulation were retired with the intention that closed waters in those areas would be defined using the general closed waters definition found in 5 AAC 39.290. Most of those markers were not removed due to their remote locations and it was determined they would be allowed to deteriorate in place. There has been confusion in recent years that specific closed waters points were not codified in regulation and commercial salmon fishery stakeholders have indicated that clear latitude and longitude points defining closed waters are preferred to the language in 5 AAC 39.290. This will aid in enforcing commercial salmon fishing closed waters in Lower Cook Inlet.

**PROPOSED BY:** Alaska Department of Fish and Game (HQ-F23-006)  
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**PROPOSAL 40**

**5 AAC 21.350. Closed waters.**

Amend waters closed to commercial fishing for salmon as follows:

5 AAC 21.350(e) is amended by adding new paragraphs to read:

(e) Kamishak Bay District

**(8) waters of Rocky Cove inshore of a line from 59° 26.98' N. lat., 153° 44.36' W. long., to 59° 26.37' N. lat., 153° 43.92' W. long.;**

**(9) waters of the Bruin Bay inshore of a line from 59° 22.59' N. lat., 154° 08.43' W. long., to 59° 22.43' N. lat., 154° 07.03' W. long.**

5 AAC 21.350(f) is amended by adding new paragraphs to read:

(f) Outer District

**(15) waters of Rocky Bay (Scurvy Creek) inshore of a line from 59° 14.91' N. lat., 151° 26.96' W. long. to 59° 14.85' N. lat., 151° 26.87' W. long.;**

**(16) waters of Middle Creek (Shelter Cove) inshore of a line from 59° 17.22' N. lat., 151° 14.78' W. long. to 59° 17.02' N. lat., 151° 13.91' W. long.;**

**(17) waters of Island Creek inshore of a line from 59° 15.31' N. lat., 151° 07.13' W. long. to 59° 15.28' N. lat., 151° 06.99' W. long.;**

**(18) waters of Island Creek inshore of a line from 59° 15.95' N. lat., 151° 09.39' W. long. to 59° 15.80' N. lat., 151° 09.25' W. long.;**

5 AAC 21.350(d) is amended to read:

(d) Southern District

**(2) waters of the south arm of China Poot Bay east of 151° 15.53' west long., and waters of the north arm of China Poot Bay west of 151° 14.65' w. long.** [ WATERS OF CHINA POOT BAY SOUTH AND EAST OF A LINE BENEATH THE HOMER ELECTRIC ASSOCIATION POWER LINE FROM A POINT ON THE NORTH SHORE OF THE NORTH ARM OF CHINA POOT BAY AT 59° 33.92' N .LAT., 151° 15.42' W. LONG., TO A POINT ON THE PENINSULA BETWEEN THE NORTH AND SOUTH ARM OF CHINA POOT BAY AT 59° 33.47' N. LAT., 151° 15.71' W. LONG., TO A POINT ON THE SOUTH SHORE OF THE SOUTH ARM OF CHINA POOT BAY AT 59° 33.21' N. LAT., 151° 16.46' W. LONG.];

**What is the issue you would like the board to address and why?** In Lower Cook Inlet waters closed to commercial salmon harvest are defined using a variety of methods. In addition to being specified in regulation, closed waters have historically been identified using physical signs or markers, as well as on maps distributed by the Homer area Alaska Department of Fish and Game (department) office. Given the widespread availability of Global Positioning System technology, the department has ended its regulatory marker program in this area. The proposal identifies waters in the Kamishak and Outer districts that have historically been closed to commercial salmon fishing. These closed waters were previously only identified with markers. The public, enforcement, and department all benefit from clearly defined closed waters with Global Positioning System coordinates. Waters of China Poot Bay need to be changed in regulation to match where the fleet has been allowed by emergency order to fish to since the early 1990's.

**PROPOSED BY:** Paul Roth (EF-F23-150)  
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**PROPOSAL 41**

**5 AAC 21.350. Closed waters.**

Close a portion of Tutka Bay to commercial fishing for salmon as follows:

**Reinstate the head of Tutka Bay by closing productive waters as follows:**

Under 5 AAC 21.350. Closed waters. (d) Southern District:

**ADD: (4) waters of Tutka Bay southeast of 59 25.50' N. lat.;**

**What is the issue you would like the board to address and why?** Tutka Bay is located in ADFG's Legislatively designated Kachemak Bay Critical Habitat Area. 5 AAC 95.610, The Critical Habitat Management Plan Goals and Policies, gives ADFG guidance that:



"Priority should be given to encouraging rehabilitation of depleted indigenous fish populations"; and "Recognize cumulative impacts when considering effects of small incremental developments and action affecting critical habitat resources."; and "protect natural substrate and aquatic vegetation...to maintain aquatic habitats."

The issue is to prioritize regulations to protect habitat for depleted species from cumulative impacts of CIAA's hatchery cost recovery seine net lead lines scraping the aquatic substrate and vegetation, The head of Tutka Bay is a rare highly productive vegetated salt marsh. It functions as a delta used as cover for predator avoidance by valuable depleted shellfish, crustaceans, and larval fishes as aid to prioritize their rehabilitation. This delta is a valuable rearing, spawning, reproductive concentration habitat as designated by ADFG. The Tutka Head End, and Southern Glacier Creeks that flow into the head of Tutka Bay are nominated ADFG anadromous waters contributing wild coho, chum, pink and dolly to the collective mixed stock fisheries. This wild fish diversity of species requires priority management not to sacrifice resources, but to recognize cumulative impacts affecting resources.

**PROPOSED BY:** Pioneer Alaskan Fisheries Inc. (EF-F23-126)

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#### **PROPOSAL 42**

#### **5 AAC 21.373. Trail Lakes Hatchery Sockeye Salmon Management Plan.**

Readopt the *Bear Lake Management Plan* as follows:

The regulation should invoke the sunset clause in Proposal 380 (as amended) reinstating the Bear Lake Management Plan with a 50/50 split between cost-recovery and common property.

**What is the issue you would like the board to address and why?** Replace the Trail Lakes Hatchery Sockeye Salmon Management Plan with the Bear Lake Management Plan.

THE ISSUE: The Board accepted a petition to dissolve the Bear Lake Management Plan out of cycle at a meeting in Petersburg in January of 2009. Regulatory consideration at a meeting in Anchorage in March of 2009 resulted in Proposal 380, replacing the Bear Lake Plan with the Trail Lakes Plan. Proposal 380 passed as amended. The amendment included a sunset clause. The Trail Lakes Plan was to be in place for 2009 and 2010 seasons only and expire in May of 2011.

At the LCI meeting in Homer in 2010, CIAA submitted Proposal 12 which would remove the sunset clause and make the Trail Lakes Hatchery Management Plan permanent. Proposal 12 failed.

13 years later, The Trail Lakes Hatchery Management plan is still in place. CIAA has achieved cost recovery goals only twice, in 2009 and 2018.

At the LCI meeting in Homer in November of 2004, the Board carried, as amended, Proposal 15 which made all of Resurrection Bay a cost recovery SHA for CIAA. The amendment read "The Department shall manage the commercial harvest of enhanced Bear Lake sockeye salmon surplus to in river escapement requirements for a 50/50 allocation in numbers of fish between the commercial seine fleet and the Trail Lakes Hatchery operators in waters of Resurrection Bay."

WHY THIS IS IMPORTANT: My concern is that this fishery is currently being managed only for cost recovery and brood stock. I am against a fishery being managed solely for the hatchery and not for the fishermen. The enhancement tax paid by the fishermen is designed to support the hatchery, not 100% cost-recovery from a single designated resource. The commercial fleet should see some benefit for their money. CIAA has had 13 years to make this plan work. It has not. Cost recovery goals have only been met twice.

**PROPOSED BY:** Diane Dubuc

(HQ-F23-054)

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**PROPOSAL 43**

**5 AAC 40.820. Basic Management Plans.**

Amend Basic Management Plans as follows (*This proposal will be heard and public testimony will be taken at both the LCI and UCI meetings and deliberated at the UCI meeting*):

Amend the *Cook Inlet Salmon Enhancement Allocation Plan* to specify hatchery pink salmon production, as follows:

Reduce hatchery production to 25% of the year 2000 production as promised in 2000.

**What is the issue you would like the board to address and why?** There is an over-production of hatchery pink salmon that threatens wild Alaska stocks.

In 1996 Elfin Cove Advisory Committee put in a proposal to restrict hatchery production according to the original intent of rehabilitating wild salmon runs. They wanted a substantial reduction in current hatchery production. The hatchery managers complained the Board did not have the authority to set their production. After a thorough examination (approximately one year), the Attorney General ruled the Board does have the authority to regulate the number of eggs taken for production. The Board deferred the proposal and formed a hatchery committee to gather information. This committee was comprised of Board members Dan Coffey, Virgil Umphenour and Grant Miller. It took three years, a full Board cycle, with meetings in every region of the state, to complete the report.

The proposal was scheduled for the January- February 2000, a super meeting of Bristol Bay, AYK and Area M. The hatchery management met with the Governor and proffered that if the Board would not take up the proposal they would reduce their production by 25%. The Board meeting lasted 26 days, 10-16 hours a day, accepting the promise from the hatchery managers in the interest of time.

The marine productivity is currently in a very low cycle. The wild salmon are starving, many small systems are extirpated. Most of AYK/ Cook Inlet stocks are not meeting escapement goals and have very little or no harvest of Chinook, chum and coho salmon.

The purpose of this proposal is strictly conservation, to hold the hatcheries to their 2000 promise. The Board should require a substantial reduction in production so the wild fish don't have to compete, as noted by hundreds of science papers, with hatchery fish for food.

**PROPOSED BY:** Fairbanks Fish and Game Advisory Committee (EF-F23-151)

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