

PROPOSAL 101

5 AAC 33.375. District 13: Silver Bay (Medvejie Creek Hatchery) Salmon Management Plan. Modify management plan to further consider potential effect of hatchery-produced salmon on wild-stock salmon, as follows:

5 AAC 33.375. District 13: Silver Bay (Medvejie Creek Hatchery) Salmon Management Plan

The commissioner shall open and close, by emergency order, salmon fishing seasons and periods in waters of Silver Bay east of a line from Entry Point Light at 57° 01.58' N. lat., 135° 14.58' W. long., to Silver Point at 57° 00.82' N. lat., 135° 18.10' W. long., to ensure **fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks,[1] to ensure management to achieve** chum salmon broodstock escapement to the Medvejie Creek Hatchery **shall be consistent with sustained yield of wild fish stocks[2]** and to allow for the common property fisheries to harvest excess salmon, including king salmon by troll gear before July 31

(a) Medvejie Creek Hatchery has legislative responsibility to incorporate the following PNP Hatchery Act mandated obligations:

(1) hatchery programs shall be operated without adversely affecting natural stocks of fish in the state[4]

(2) hatchery programs shall be operated under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks:[5]

(3) Hatchery program remote release sites shall be located in an area where a reasonable segregation from natural stocks occurs.[6]

(4)hatchery operations and specifications must be consistent with the comprehensive regional salmon plan approved under AS 16.10.375[7]

(5) SE CSP's. concern for wild stocks is triggered when hatchery salmon straying rates exceed 2%. Any higher rates must be validated to not jeopardize wild populations by the department,[8]

(6) the department and board shall define and validate straying proportions "based on the best available scientific information" to sustain productivity, without adversely affecting, or jeopardizing sustained yield of wild naturally occurring salmon[9],[10]

(7) validated proportions of benign hatchery salmon straying are defined as chinook xxx%; sockeye xxx%; coho xxx%; chum xxx%, pink xxx%;

(8) Until the department and board have a policy of management that justifies and validates this reasonable segregation, of straying proportions without jeopardizing wild stock sustained yield,[1] the CSP and genetics policy 2% rule will be adhered to within wild naturally occurring streams[11]

(9) when proportions of hatchery salmon straying exceed validated percentages, jeopardizing sustained yield of wild fish stocks, production shall be ramped down the following spring, from each Remote Release Site, hatchery or THA source incrementally until adverse affects cease[12],[13]

[1] AS 16.05.730 (a) Management of Wild and enhanced Stocks of Fish

[2] AS 16.05.730 (b) Management of Wild and enhanced Stocks of Fish

[3] AS 16.05.730 Management of Wild and Enhanced Stocks of Fish.

[4] PNP Hatchery Act legislative intent

[5] PNP Hatchery Act legislative intent

- [6] AS 16.10.420. (10) Conditions of a Hatchery Permit
- [7] AS 16.10.480 (f) Contracts for the Operation of State Hatcheries
- [8] 5 AAC 39.222 Policy For The Management Of Sustainable Salmon Fisheries (c)(1) (B),(D); (2)(D); (3)(B),(F)
- [9] 5AAC 39.222 Policy For The Management Of Sustainable Salmon Fisheries (c)(1) (B),(D), (2)(D); (3)(B),(F)
- [10] PNP Hatchery Act legislative intent
- [11] 5AAC 39.222 Policy For The Management Of Sustainable Salmon Fisheries (c)(1) (B),(D); (2)(D); (3)(B)(F)
- [12] Intent of PNP Hatchery Act
- [13] Article VIII Section3 and 4. Natural Resources, Common Use; Sustained Yield. Alaska Constitution

What is the issue you would like the board to address and why? The issue is unreasonable temporal integration of artificially propagated late run hatchery stock chums, being tolerated to breed with early run spawning wild natural chum populations and dig up their redds in West Crawfish NE Arm, Whale Bay and surrounding anadromous waters. This remaining pristine quadrant of SEAK is getting hammered by stray hatchery fish. This area is a wilderness area.

West Crawfish wild summer chum salmon is 1 of 9 escapement indicator stocks used by the department for escapement. How reliable is this escapement now? This system accounts for an average 24% of the total Northern Southeast subregion index making it the areas second largest natural wild chum run. It is a significant stock. It is the public trust.

With the Relative Reproductive Success RRS found to be so low in hatchery pinks, chinook, coho and sockeye we can only hope and pray this affliction of reduced productivity and fitness in hatchery chums is not the same...as the damage is tolerated to continue in sustained yield of wild salmon.

This West Crawfish wild summer run timing chum population was sampled as part of the Alaska Hatchery Straying Research Program (AHRP) prior to 2015 and found very few hatchery fish straying into the system, below 2% making it genetically relatively pristine.

But not any more...

As stated by ADFG staff, Otolith sampling performed at peak run timing in late August to early September, became bloated with stray fall run timing hatchery chums documented at 80.5% in 2018 and 53% in 2019 contaminating this wild "naturally occurring" salmon. This is unacceptable.

Temporal separation does not exist in West Crawfish NE ARM. Staff written comments submitted as RC 2 in the October 2019 work session made this lack of temporal separation perfectly clear: "The peak of the wild summer chum run is probably late august to early September" documented when high proportions of straying occurred. "The latest chum salmon survey data for the West Crawfish NE Head Index stream is September 7, 2006, and included 400 chum salmon at the mouth, 100 in the intertidal, 2780 live in the creek, and 5400 carcasses."

“In most other late August survey counts, live chum, still outnumber dead more often than not “
However, these accurate submitted comments were overridden when Board members’ questions were given inaccurate verbal answers at the work session that stated: "...we spoke to temporal separation between these runs... There's a 3 to 4...about 3 weeks difference in peak run timing in the stock in West Crawfish and the stock used for this return... "there aren't the wild stocks in there because they've already perished or ah ah moved on...." Already perished and moved on???

Having three thousand live wild fish in the river with hundreds still down at the mouth when these hatchery strays flood in on top of them by the thousands is about as far from temporal separation as you can get. And the wild redds will be dug up and replaced with hatchery maladapted genetics. This is flat wrong. When a board member asked "Is there a defined acceptable or unacceptable rate of straying under the hatchery permit?"

The answer was: "pause, yeh, There is not. um,... stray proportions or stray rates are um... stock and species specific and..., there is a tremendous amount of work out there trying to figure those things out but um a lot of it depends on what stock you're using."

How is the board going to be able to comprehensively deliberate when faulty obscure flip flopping answers are given to critically important questions? This is very distressing as a member of the public to witness this diversion from truth to the regulatory body of the State of Alaska.

Since these straying episodes confound the Alaska Hatchery Research Program results seriously negatively skewing them. How is this going to be reconciled? Will genetic sampling be taken to see what damage has or is occurring?

Crawfish received a band aid approach by amending Section 5 AAC 29.112 - Management of chum salmon troll fishery to intercept these hatchery fish before they get to the spawning grounds. This does not address jeopardizing natural stocks and masks catching wild fish in the mixed stock fisheries as they migrate into these wild systems. It also does not address the undermining of ADFG determination that when bullied at RPT meetings to move into full production ADFG required the understanding that the program would ramp down if problems were discovered. So...Problems were discovered, nothing is ramped down and this determination was ignored.

The issue is there is no Policy of Management, that comprehensively addresses a defined acceptable or unacceptable rate of straying under the hatchery permit as Board Member Van Dort wisely asked for, without consulting comprehensive salmon plans and with RPT meetings dominated by industry without any biological basis it is no wonder that the poorly selected remote release site was allowed in Crawfish Inlet.

There appears to be a grave disregard for the ADFG determination and this discrepancy needs repair by PARS coming to the BOF to amend by regulation as the Statutes designed. Please fix the straying disaster we have in Alaska by creating the mandated Policy of Management that addresses reasonable segregation and temporal separation keeping hatchery fish away from wild fish spawning in their habitats.

PROPOSED BY: Pioneer Alaskan Fisheries Inc.

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