

Salmon Hatcheries for Alaska

Opposition to Proposals 170, 171 & 172

Alaska Board of Fisheries — Statewide Meeting 2026

Public Comment Deadline: **March 2, 2026, 11:59 PM AKST**

Statewide Finfish Meeting: **March 17–21, 2026 — Anchorage, AK**

SUMMARY

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.

THE THREE PROPOSALS

PROPOSAL 170 — Statewide 25% Egg Take Reduction

- Mandates a **25% reduction** of current permitted egg take for pink and chum salmon at every permitted hatchery statewide — regardless of region, performance, or species interactions.
- Applies automatically, **without** site-specific findings, stock-specific analysis, or demonstrated causal impacts to wild stocks.
- Immediately lowers hatchery juvenile releases, adult returns, and harvest opportunity across Southeast Alaska, Prince William Sound, Kodiak, and Cook Inlet.
- Reduces revenues funding hatchery operations, Chinook/Coho/Sockeye programs, commercial harvests, and coastal jobs.
- Establishes a precedent for **arbitrary percentage-based reductions** without defined metrics for success, reversal, or evaluation.

PROPOSAL 171 — Prince William Sound Pink Salmon Reductions

- Requires changes to PWS pink salmon hatchery permits tied to **yet-to-be-determined stray thresholds** — even though existing data show PWS stray rates collectively low in Lower Cook Inlet (LCI).
- **No negative impacts** from straying have been found in LCI pink salmon stocks; existing permit conditions already require monitoring and management.
- Forces production reductions regardless of whether alternative tools (release strategies, operational modifications, fisheries management changes) could achieve the same result.
- Creates **cross-regional regulatory linkage** between PWS and LCI, setting a dangerous precedent for regional penalties.
- Limits ADF&G's flexibility to manage straying through permit conditions and administrative oversight.

PROPOSAL 172 — Moratorium on Increases in Pink & Chum Hatchery Production

- Imposes a **formal statewide moratorium** on any increase in permitted egg take for pink and chum salmon relative to 2025 levels — applied indefinitely until repealed.
- Freezes production regardless of regional need, performance, or conservation outcomes.
- **Vetoes the Regional Planning Team process** — a public process granted under 5AAC40.340 — removing established scientific evaluation.
- Preempts authority of the Commissioner granted by the Legislature and eliminates case-by-case scientific review.
- Creates regulatory uncertainty for hatchery operators, coastal communities, and processors — **shifting Alaska's system from adaptive management to regulatory paralysis.**

BIG PICTURE: COMBINED IMPACT

If all three proposals were adopted together, Alaska would see the following outcomes — **without requiring any demonstrated causal link** between hatchery production and the conservation concerns cited, directly contradicting Alaska's long-standing commitment to science-based, adaptive fisheries management:

- Mandatory and arbitrary **statewide production reductions**
- Region-specific production cuts
- A **permanent cap** on future increases
- Reduced harvest opportunity for all users: commercial, sport, subsistence, and personal use
- **Economic harm** to coastal communities, local jobs, and tax revenues
- Diminished flexibility for the application of science-based management

MESSAGING PILLARS

PILLAR 1

These Proposals Replace Science-Based Management With Preemptive Punishment

Alaska's hatchery system is governed by a science-led, permit-based, adaptive management framework administered by ADF&G. Production levels are established through permits, reviewed continuously, and adjusted when data demonstrate need. Proposals 170, 171, and 172 do not respond to a demonstrated failure of that system — they impose reductions or freezes based on generalized concern and unresolved scientific questions. **If uncertainty alone justifies mandatory reductions, then no enhancement, harvest, or management program in Alaska could continue to operate.**

PILLAR 2

No Demonstrated Causal Link of Harm to Justify Blanket Reductions

The proposals assert that hatcheries are contributing to widespread wild salmon declines through ocean competition, genetics, or ecosystem effects. However: hatchery production has been stable since 2019; declines in Chinook and chum are not uniform across Alaska; strong returns continue in many regions where hatcheries operate. In Western Alaska, federal and state scientists have identified climate-driven marine and freshwater changes as **the primary drivers** of recent collapses. Absent a demonstrated causal relationship, blanket egg take reductions and moratoria are not justified.

PILLAR 3

Proposal 170's 25% Reduction Is Arbitrary and Disconnected From Data

There is no scientific basis presented for selecting 25% rather than 10%, 5%, or 50%. The proposal does not identify which stocks would benefit, how impacts of reductions would be measured, what threshold would trigger reversal, or how losses to fisheries and communities would be mitigated. **This is not adaptive management.** It is an arbitrary policy intervention that reduces harvest opportunity and weakens food security without evidence of conservation benefit.

PILLAR 4

Proposal 171 Misuses Stray Data to Justify Production Cuts

Proposal 171 relies on an unsupported stray threshold that is restrictively lower than natural stray rates for pink salmon. Straying is already monitored, reported, and addressed through permit conditions and management actions. ADF&G has tools to respond when concerns are warranted — including operational changes short of egg take reductions. **The proposal assumes production cuts are the only solution without demonstrating harm or that alternative measures have failed.**

**PILLAR
5****Proposal 172's Moratorium Is Redundant, Premature, and Harmful**

There is already no expansion for pink salmon production underway, and most existing hatcheries are at full capacity. The Commissioner has exercised discretion conservatively. The Alaska Hatchery Research Project is ongoing and designed specifically to inform future decisions. A Board-imposed moratorium adds no new conservation protection — but it creates regulatory rigidity, undermines adaptive management, removes established public processes, and signals policy instability. **Precaution does not mean paralysis.**

**PILLAR
6****These Proposals Ignore Real-World Consequences**

PNP hatcheries support commercial, subsistence, sport, and personal-use fisheries; coastal employment and local economies through fisheries taxes that fund schools and municipal infrastructure; food security in Alaska and beyond; and stability during years of low wild abundance. Mandatory reductions or freezes will have **immediate economic and social impacts**, while offering no demonstrated conservation benefit. The burden of proof should rest on those proposing disruption to a functioning system — not on communities to absorb harm while science remains unresolved.

BOTTOM LINE

Alaska does not need to abandon its science-based hatchery management system to address unsubstantiated concerns and uncertainty. The Board of Fisheries should reject Proposals 170, 171, and 172 and instead allow ongoing research, adaptive management, and site-specific responses to continue doing what they were designed to do: protect wild salmon while sustaining fisheries and communities.

SUBMIT PUBLIC COMMENT

Submit public comment by 11:59 PM AKST, March 2, 2026. [Click here to submit via Salmon Hatcheries for Alaska.](#)