

From: [Tim Koeneman](#)
To: [Senate Finance Committee](#)
Subject: HB41 Shellfish Hatcheries
Date: Monday, January 31, 2022 12:09:24 PM

Members of the Senate Finance Committee.

Please forgive the tardiness of my comments concerning HB41. My comments last year during deliberations by the House Committee on Fisheries are much more complete than my comments below.

1. There are many issues associated with the current statutes, regulations, and application associated with the current PNP hatchery programs. More information is surfacing with respect to genetics, negative interactions with wild Alaska salmon, food competition (including salmon consumption of shellfish species such as Dungeness crab larvae) and access by all Alaskan citizens. Pertinent information can be found in the scientific literature and has been available for many years, if not decades. Much of the available information is not being adequately considered in Alaska given the lack of negative comments.

2. Salmon issues are relatively simple as there are five species, or six if you include steelhead trout. The full life histories of salmon are well known. And, salmon management and hatchery processes are well known. However, there is always more to learn. Much is known about the habitat, interspecies interactions, and to some degree extra species interactions. Many issues remain to be resolved if current salmon hatchery programs are to meet current statutory objectives. The statutes and regulations pertaining to salmon hatcheries are in dire need of review and rewriting.

3. There are many, many different genera and species of shellfish, even if one only considers those with current subsistence, personal use, sport, charter, and commercial use. Their life histories are extremely complex and diverse, often including months of pelagic development before settlement. Their habitat and other environmental requirements are also very diverse, including the full range of estuary, marine, temperature, fresh water, and open ocean environments. Shading effects of mariculture projects will probably effect the productivity of associated waters, similar to an old growth forest. Detritus dropping out of current salmon net pens is probably having a negative effect on a portion of the pelagic and benthic environment.

4. Much more information is required to develop and model a meaningful shellfish hatchery program in Alaska that truly meets the current statutory requirements. One has to only look at the relative failure of our once significant shellfish fisheries throughout the regions of the state to know that our level of knowledge on a few species was insufficient to allow for sustained fisheries. Look at SE abalone, Westward king and Tanner crab fisheries, Yakutat Dungeness crab, PWS spot prawns, etc. An outside review of factors contributing to the failures of once significant shellfish fisheries in the State should be accomplished before embarking on a wide open process on shellfish hatcheries.

5. I am opposed to the bill as written. It requires much work and objective input from the various departments, especially the Department of Fish and Game. I would not be opposed to an initial pilot project focused on one or two species, that could be accomplished by special permit of the ADFG Commissioner. I would not be opposed to small land based hatcheries that are closed circuit. However, supporting a shellfish hatchery bill modeled after the current salmon statutes and regulations would be a significant mistake.

6. My experience with shellfish fisheries includes a number of years in fisheries consulting, commercial fishing, research and managing SE and Yakutat shellfish fisheries.

Thank you for the opportunity to provide my comments. I would happy to answer any questions you might have via email.

Respectfully,
Timothy Koeneman
Petersburg, Alaska.

