



Southeast Alaska Fishermen's Alliance

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April 2, 2025

House Fisheries Committee
Alaska State Legislature
Alaska State Capitol
Juneau, AK 99811

RE: OPPOSE HB 111 – FINFISH FARMING

Dear Representative Stutes, Chairwoman and House Fisheries Committee Members,

Southeast Alaska Fishermen's Alliance (SEAFA) is a multi-gear/multi-species commercial fishing association representing our 300+ members involved in salmon, crab, shrimp and longline fisheries mainly in Southeast Alaska.

SEAFA opposes HB 111 to allow land-locked finfish farming in the State of Alaska. Importing non-native species is a risk to our wild fishery resources even with the requirement for stocking a lake under positive control. Even if a lake or containment is under positive control as long as it is open, there is the possibility of harm to the wild fishery resources through disease transmission or even if triploid fish are stocked, it is not 100% guaranteed they are all sterile by transmission of wild predators (birds, bears etc).

Alaska salmon is a well-known brand that finfish farming will harm and cause confusion in the marketplace when you start selling farmed fish out of Alaska. Additionally, this legislation opens the door for other types of finfish farming to be expanded at a later date.


In HB 111 and the legislation passed last year for lake stocking and the Delegation of Authority given to the Commissioner by the Board of Fish at the March Statewide meeting, (see attached SEAFA comments on the Delegation of Authority request) there is the very real possibility that lakes in Alaska for non-commercial uses will be stocked

without any permitting. In addition, the permitting for a commercial finfish farm appears to have no public process or review by the public before being granted a permit unlike the non-profit hatchery permit process. In HB 111 version a, page 7 lines 11-13 allows lake stocking on private property without a permit, allowing lake stocking to occur with no documentation of their locations by any agency or oversight for disease or other potential issues.

This legislation in section 11 allows ASMI to market finfish farm products but where and by what mechanism will funds be collected by the finfish farms to support ASMI.

Please do not pass HB 111 out of fisheries committee and protect our wild and natural fishery resources.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen
Executive Director



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February 20, 2025

Alaska Dept of Fish & Game

Board of Fisheries

PO Box 225526

Juneau, AK 99811-5526

SUBMITTED VIA ONLINE PORTAL

RE: Misc Business – Delegation of Authority to Change Regulations to Create a New Discretionary Exemption on the Importation and Release of Live Fish to Stock Lakes

Dear Marit Van Dort, Chair and Board of Fish Members,

SEAFA is opposed to the Delegation of Authority as written to allow the importation of live fish from out of the state. The language in the bill implied the use of local hatchery produced salmonoids for stocking of lakes. This belief is based on the language in the bill, listening to the hearings and 5AAC 41.070 (a)¹ which prohibits the importation of live fish into the state for purposes of stocking or rearing in the water of the state.

While HB 295 did not specifically prohibit importation of salmonoids from out of the state, it did not **specifically grant authority for importation of live fish from out of state**. The testimony during public legislative hearings would have had strong opposition stated to importation from out of state.

SEAFA is concerned about the importation of live salmonoids from out of state and the potential effect on our sustainable wild stocks. With the concern the Board of Fish has been expressing over the hatchery programs, it seems strange that they would allow for importation of out of state salmonoids into state waters. It only takes a bear or eagle to pick up a fish from a lake and drop it in other state waters to create an impact on our wild salmon since even triploid salmonoids are not 100% sterile.

¹ 5AAC 41.070 – Prohibitions on importation and release of live fish

(a) Except as provided in (b) – (d) of this section, no person may import any live fish into the state for purposes of stocking or rearing in the waters or the lands of the state.

SEAFA was monitoring the legislation and assumed being the Governor's bill that the State of Alaska hatcheries would likely be providing the salmonoids for private lake stocking.

We would recommend if Delegation of Authority is given to allow out of state importation of live salmonoids that the language in the Delegation of Authority and the specify only stocking **"landlocked"** lakes under 5 AAC 41.070 and that **only triploid salmon** may be imported as additional safeguards. An additional concern we have is a fish transport permit (FTP) is a process that does not go to the RPT but is between the individual and ADF&G and therefore no public comment within the process. For hatcheries, in Alaska the hatchery permit, and permit alteration requests go through the regional planning team process and then a FTP is issued from the Department. Stocking of private lakes does not have a public process component.

Please take careful consideration of this delegation of authority to allow the importation of live salmonoids from out of state.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Hansen", followed by a long horizontal line.

Kathy Hansen
Executive Director

ALASKA BOARD OF FISHERIES
DELEGATION OF AUTHORITY TO CHANGE REGULATIONS WITHIN 5 AAC 41 TO
CREATE A NEW DISCRETIONARY EXEMPTION ON THE IMPORTATION AND
RELEASE OF LIVE FISH TO STOCK LAKES

2024-XXX-FB

Under the authority of AS 16.05.270, the Alaska Board of Fisheries (board) delegates to the Commissioner of the Department of Fish and Game (commissioner) authority under AS 16.05.251 to adopt and amend regulations related to the issuance of Fish Transport Permits. Specifically, this delegation authorizes the commissioner to consider, and at the commissioner's discretion, adopt and amend regulations to incorporate an additional exemption to the prohibition on the importation and release of live fish to stock lakes under 5 AAC 41.070. The Alaska State Legislature in passing HB295 (Chapter 32 SLA 24) showed clear intent to allow the public to purchase hatchery-produced salmonids for the purpose of stocking lakes in Alaska. Therefore, the board delegates its authority to the commissioner to make conforming regulation changes as necessary to adhere to the legislative intent, in accordance with the Administrative Procedures Act (AS 44.62).

In amending the regulation, the commissioner shall require the hatchery-produced salmonid product and proposed stocking location(s) meet all existing policies, including the Department of Fish and Game's lake stocking, genetics, and fish health policies. The commissioner must also consider the best available information related to past permitting processes and maintain sustained yield practices to ensure the permitting process provides the necessary safeguards to prevent adverse effects on Alaska's wild fish populations. This delegation includes authority to amend other regulations to acknowledge or otherwise conform to these regulatory permitting requirements.

Vote: X-X _____

December X, 2024
Anchorage, Alaska

Märit Carlson-Van Dort, Chair Alaska Board of Fisheries²

² <https://www.adfg.alaska.gov/static/regulations/regprocess/fisheriesboard/pdfs/2024-2025/sws/authority.pdf>
passed the Board of Fish on a vote of 5 for / 2 against March 15, 2025