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Bristol Bay Economic Development Corporation

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Alaska Board of Fisheries
Chairman Karl Johnstone, et al.
Statewide Finfish and Supplemental Issues Regulatory Meeting
Anchorage, AK

13 March 2013

**RE: Opposition to Proposal 243 (Inclusion of Herring
in 5 AAC 39.212 Forage Fish Management Plan)**



Dear Board of Fisheries members,

The Bristol Bay Economic Development Corporation, on behalf of the 17 Southwest Alaska communities we serve, strongly urges the Alaska Board of Fisheries to oppose Proposal 243, which would include Pacific herring in the state's Forage Fish Management Plan (FFMP) under 5 AAC.39.212.

Amending the FFMP to include herring as forage fish is both unnecessary and potentially economically disruptive to our communities. ADF&G has demonstrated its ability to manage herring stocks for sustainability as mandated by the Alaska Constitution, and adding an additional layer of regulation to herring management plans across the state will likely have unforeseen negative economic consequences for coastal residents who have historically participated in western Alaska's herring fisheries.

The effectiveness of present herring management plans is illustrated in the state's largest herring sac-roe fishery prosecuted at Togiak in Bristol Bay. Commercially harvested since the late 1970s, the forecasted biomass of herring expected to return to Togiak in 2013 is 169,094 metric tons. That volume of fish is 113% larger than the average observed biomass over the last 10 years, and larger than the observed biomass in all but four of the last 35 years. Abundance at historic levels, and age composition data showing that 7- and 8-year-old herring are expected to comprise nearly 50 percent of the 2013 return, speak both to the health of the Togiak herring resource and the effectiveness of the fishery's existing management plan. Fears that the resource is being depleted are unfounded.

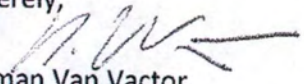
In some years the Togiak herring fishery has generated more than \$12 million for hundreds of boats and their crews. Although participation has declined significantly in recent years due to market changes in Japan, indications suggest a renewed interest in the resource with at least two new buyers planning to purchase Togiak herring in 2013 and 2014. Classifying Pacific herring as forage fish will have negative economic consequences in a region of high unemployment and few economic alternatives.

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These conditions are mirrored on Alaska's Bering Sea coast, where residents face a similar situation: local herring stocks are abundant and healthy (although often under-utilized) while local communities are characterized by extremely limited economic opportunity. As is the case in Bristol Bay, there is no biological reason to adopt regulations to conserve an already well-managed fishery resource, especially when doing so will restrict appropriate and sustainable fisheries economic development.

Please oppose Proposal 243.

Sincerely,



Norman Van Vactor
President / CEO

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