

PROPOSAL 209 – 5 AAC 39.212. Forage Fish Management Plan. Designate Pacific herring as a forage fish, as follows:

5 AAC 39.212. Forage Fish Management Plan is amended to read:

...

(f) For the purposes of this section, "forage fish" means the following species of fish:

...

(10)Family Clupidae (Pacific herring).

What is the issue you would like the board to address and why? Herring (*Clupea pallasii*) fill the exact ecological niche described in the Forage Fish Management Plan. Herring feed on zoo- and phytoplankton and, in turn, are food for seabirds, salmon, and marine mammals. Herring, especially juvenile herring, are of particular importance to salmon and have been shown to constitute up to 62% of the diets of Chinook salmon (Canada Department of Oceans and Fisheries, 2013).

Ecologically, herring are indisputably forage fish. Pretending, by omission, that they are not is a scientific and legal absurdity. Herring are classified as forage fish by most government agencies, including the United States Geological Survey, the National Oceanic and Atmospheric Administration, the U.S. federal government, and the Alaska Department of Fish and Game (Alaska Research Fisheries Bulletin, 2002). Those agencies acknowledge herring to be critical to the Alaskan food web. In recognition of this, the fishing of herring in federal waters is prohibited and they cannot not be retained as bycatch (Magnuson Stevens Act, 1976).

By contrast, the State of Alaska does not classify herring as a forage fish. Adding herring to the Forage Fish Management Plan would not change or close existing fisheries, but it would bring the State of Alaska in line with scientific evidence, federal policy, practical experience, and official designation.

PROPOSED BY: Floyd Tomkins

(EF-C15-069)
