

ACR 10

Close Sitka Sound commercial sac roe herring fishery until regional herring stock status improves, additional research on herring is conducted, and the amount necessary for subsistence is met in at least three consecutive years (5 AAC 27.110 and 5 AAC 27.160).

CITE THE REGULATION THAT WILL BE CHANGED IF THIS ACR IS HEARD. 5 AAC 27.160(g).

WHAT IS THE PROBLEM YOU WOULD LIKE THE BOARD TO ADDRESS? STATE IN DETAIL THE NATURE OF THE CURRENT PROBLEM. Subsistence availability of roe on kelp and roe on branch has collapsed in Southeast Alaska in recent decades for reasons that are poorly understood but which likely include overfishing by the sac-roe seine and gillnet fisheries and may further include changes to ocean habitat carrying capacity, ocean acidification, and global warming. Subsistence needs have not been met in 8 out of the last 10 years. Despite high effort, this year did not even approach the ANS.

Commercial sac-roe herring fisheries, in combination with other ocean conditions which have not been sufficiently studied, have regularly heralded a global and regional pattern of herring stock collapse wherever this management paradigm has been adopted.

WHAT SOLUTION DO YOU PREFER? Commercial fisheries for herring sac roe will be closed in Sitka Sound until: a) regional stocks have shown signs of rebound; b) herring genetics, movement and migration patterns, and the impacts of intensive disturbance in herring spawning grounds are better understood; c) subsistence needs have been met at the current ANS in at least 3 consecutive years

STATE IN DETAIL HOW THIS ACR MEETS THE CRITERIA STATED ABOVE.

- a) **for a fishery conservation purpose or reason:** Halibut, salmon, and lingcod all depend on herring. Current concerns for salmon (particularly king) stocks in Southeast Alaska, coupled with recent failures in the herring fishery, show an urgent fishery conservation rationale for closing the fishery. Current usage of herring is wasteful, dangerous, and unsustainable. We must ensure the long-term survival and rebound of herring populations, and allow herring to fully serve the ecosystem niche that they have occupied for millennia.
- b) **to correct an error in regulation:**
- c) **to correct an effect on a fishery that was unforeseen when a regulation was adopted:** When the regulation was originally adopted, it did not acknowledge longstanding indigenous/traditional ecological knowledge about herring. That knowledge recognizes that herring are vulnerable to disturbance during spawning. Further, given the global and regional history of collapse of sac-roe herring fisheries, there is little justification for the belief that harvest of herring for sac-roe is ecologically appropriate.

Since the Board last met around this issue in January 2018, the subsistence and commercial fisheries both had significant harvest failures in 2018, despite extensive effort by both, demanding reconsideration of this fishery.

WHAT WILL HAPPEN IF THIS PROBLEM IS NOT SOLVED PRIOR TO THE REGULAR CYCLE? The pattern of collapse of other herring stocks in the region, for instance in Lynn Canal in the early '80s, demonstrates that herring populations can decline precipitously and with little warning. Given the commercial and subsistence failures of recent years, there is reasonable concern that this could occur in Sitka. Indeed, it has happened in nearly all places that this management paradigm has been enacted.

STATE WHY YOUR ACR IS NOT PREDOMINANTLY ALLOCATIVE. This ACR is not predominantly allocative, and is not about granting one user group access to fish rather than another; rather, it regards concerns with conservation and subsistence resulting from the current management paradigm.

IF THIS REQUEST IS ALLOCATIVE, STATE THE NEW INFORMATION THAT COMPELS THE BOARD TO CONSIDER AN ALLOCATIVE PROPOSAL OUTSIDE OF THE REGULAR CYCLE.

STATE YOUR INVOLVEMENT IN THE FISHERY THAT IS THE SUBJECT OF THIS ACR. Citizens / Subsistence Users

STATE WHETHER THIS ACR HAS BEEN CONSIDERED BEFORE, EITHER AS A PROPOSAL OR AS AN ACR, AND IF SO, DURING WHICH BOARD OF FISHERIES MEETING. This ACR has not been considered before as written, though a number of previous proposals targeting the wastefulness and ecological inappropriateness of the sac roe herring fishery have been reviewed by the Board of Fish; locals have long been concerned about this fishery.

SUBMITTED BY: Louise Brady and Peter Bradley