

RC 25

September 25, 2012

Dear Alaska Board of Fish,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government for over 4,100 tribal citizens located in Sitka, Alaska. As a tribal government, STA is responsible for health, welfare, safety and culture of citizens. STA would like to express its support Agenda Change Request to add Pacific herring (*Clupea pallasi*) to the State's forage fish management plan. STA feels strongly that ACR 1 meets all the criteria set forth by the Board in 5AAC 39.999.

**1) For a fishery conservation purpose or reason:**

Currently the State of Alaska does not recognize herring as a forage fish species by failing to list them in its forage fish management plan. The current management by the Alaska Department of Fish and Game has led to depleted herring stocks and resulted in many commercial fisheries being unsustainable (Tenakee Inlet, Lynn Canal, Seymour Canal, Hobart Bay, West Behm Canal and Kah Shakes). This year's failure of the Alaska Department of Fish and Game's (ADF&G) Age Structural Analysis (ASA) model to accurately predict the spawning biomass of the Sitka Sound herring combined with the inability of fishery managers to recognize this failure in season many have significantly affected the health of this stock.

Adding herring to the forage fish management plan would encourage a shift in management from a single species maximum yield approach to a more conservative integrated ecosystem based management plan that includes the needs of all users groups and the ecosystem.

**2) To correct an error in regulation.**

Whether intentional or inadvertent the omission of herring from the State's forage fish management plan is an obvious error in regulation. Herring perform the exact role of a forage fish as described by the Board in 5 ACC 39.212(b) and are recognized by biologists around the world as a forage fish species.

In addition, the current forage fish plan contradicts itself. The plan fails to specifically list herring as a forage fish, but lists exclusions to the plan that focus solely on the commercial harvest of herring. The exclusions aren't necessary if herring aren't listed as a forage fish.

**3) To correct an effect on a fishery that was unforeseen when a regulation was adopted.**

The omission of herring from the State's forage fish management plan has allowed managers the freedom to use excessive harvest rates to meet the demands for herring sac roe industry. The current single species maximum sustainable yield management of herring by the State fails to take into account the needs of all user groups and the ecosystem. This failure has significantly reduced the number of available prey fish which could be a contributing factor in the decreasing size of halibut and the declining numbers of king salmon in Alaska waters.

STA encourages the Board to acknowledge that herring are an ecological and cultural key stone species and to add them to the State's forage fish management plan. Upon the Board's approval of this ACR, STA would like to request that this proposal be placed on the January 15-20, 2013 meeting agenda in Anchorage.

If you have any questions regarding this letter or the attached resolution form the Sitka Tribal Council I can be reached at (907)747-7469 or [jeff.feldpausch@sitaktribe-nsn.gov](mailto:jeff.feldpausch@sitaktribe-nsn.gov).

Sincerely,



Jeff Feldpausch  
Resource Protection Director  
Sitka Tribe of Alaska