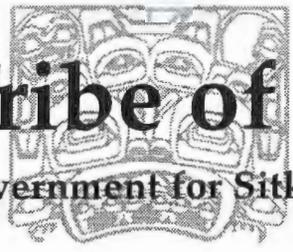


RC-029

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



February 23, 2015

Dear Alaska Board of Fisheries,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government for over 5,000 tribal citizens located in Sitka, Alaska. As a tribal government, STA is responsible for health, welfare, safety and culture of its citizens. STA respectfully submits the following comments on its conservation and subsistence concerns regarding the management of herring stocks in Sitka and the rest of Southeast Alaska. These concerns are the basis for proposals it supports (114, 118, 121, and 125) and for those it opposes (117, 119, and 122). These comments also address the declining commercial value of the Sitka Sound sac roe harvest.

CONSERVATION CONCERNS

Shifted Baseline Management

Historical data and traditional knowledge both support the fact that herring populations throughout Southeast Alaska were historically much larger than they are today. Due to over-exploitation by commercial fishing these once robust populations were decimated to their current depleted levels and are being managed under a shifted baseline.

Shifted baseline is accepting current population levels as the norm or even healthy when in reality they are well below true historic levels and exist in a depleted state. The current threshold levels of Southeast Alaska stocks were set under a shifted baseline. This is likely the cause of the 30 year collapse of the Lynn Canal stock, many of these stocks having on and off again fisheries or collapsing within their first couple of fisheries and never recovering.

Lack of In-Season Management for Conservation

The 2012 Sitka Sound sac roe fishery had a record guideline harvest level (GHL) of 29,008 tons based on the largest projected biomass on record of 145,042 tons. Prior to the commencement of the fishery, the Area Management Biologist established that the 25,000 ton threshold had been met. Approximately 6,000 tons of herring were harvested in the first opening, which resulted in a stand down from fishing for three days to process the catch. During this off time a wave of herring came into the shallows, spawned and then mixed in with the pre-spawn herring. This mixing made it difficult to locate herring that met industry roe standards. In the end there were four openings that resulted in a total harvest of 13,231 tons.

Analyses of post season data by ADF&G staff indicated that only 53% of the projected biomass actually showed up. Even though there was a profound shortfall in the biomass projection, managers made no attempt to adjust the GHL downward in-season and to the contrary, every attempt was made to harvest the full GHL.

The only thing that prevented the GHL from being achieved was the slow pace of the fishery. A harvest of the full GHL would have resulted in 40% harvest rate or twice what is allowed by regulation.

Significant Decline in the Sitka Sound Biomass

In its December 15, 2011 news release (attached) ADF&G announced that the Age Structure Analysis (ASA) model estimated that 132,000 tons of herring spawned in the Sitka Sound area the previous spring. This spawn estimate, combined with the record harvest of 19,430 tons resulted in a total return of 151,430 tons.

ADF&G's November 21, 2015 news release announced a forecasted mature spawning biomass of 44,237 tons. If this forecast is accurate the result is a 50 % reduction in the spawning biomass from that recorded in 2013 and **70% reduction** from that recorded in 2011. Nowhere in the history of ADF&G's management of this resource has there been this dramatic of a reduction in biomass over such a short period of time.

Unknown Ocean Survivals of Juvenile Herring

The results of scale data collected by ADF&G in 2014 indicated extremely poor recruitment of 3 year old herring into the fishery. It's believed this depressed recruitment is the result of poor juvenile ocean survival from brood year 2011. Currently ADF&G use an aggregate of historic juvenile survival rates to predict recruitment.

This major shortfall of the ASA model and the current management plan allows for up to a 20% harvest rate on mature herring when juvenile survivals are unknown. STA has repeatedly expressed its concerns that an abrupt, precipitous, and continued decline in the juvenile survival rate would go unnoticed for years. The decline of the 3 year old herring in the 2014 spawning biomass likely began in 2011 and is just now being realized and incorporated into the ASA model.

SUBSISTENCE CONCERNS

Historically subsistence herring eggs were harvested from numerous herring spawning populations throughout Southeast Alaska. These subsistence opportunities disappeared when herring stocks collapsed due to overexploitation by the commercial fishing industry. Currently the Sitka Sound stock is the last herring stock in the region, the State, and the world that supports a viable subsistence harvest.

STA has been working with ADF&G's Division of Subsistence since 2002 to conduct a subsistence herring egg harvester survey program. This program is designed to track harvest

trends and monitor whether the amount necessary for subsistence is being achieved. The results of these surveys indicate a high frequency (50% of the time) of needs not being met.

The herring industry has implied that a lack of participation is partially to blame for the ANS not being met. To see through the fog that's been generated over the "perceived lack of effort" you have to look at the details surrounding participation in the fishery over the last six years. In 2009, the herring industry began harvesting and distributing subsistence herring eggs throughout Southeast Alaska; at that time 91 subsistence parties participated in the fishery. The following year an all time low of 40 boats participated in the subsistence fishery but the ANS was still reached. This decline in participation can be attributed to two factors: 1) people throughout Southeast began to rely on the industry to provide them with eggs rather than harvesting their own, and 2) there's been an increase in the number of households teaming up to harvest out of one boat. The reality is that the industry is experiencing the same issues harvesting eggs as the other subsistence harvesters and this is reflected in the large fluctuations of the industry's harvest.

STA firmly believes that removing up to 20% of the spawning biomass prior to the onset of spawning or the beginning of the subsistence harvest has a profound impact on the ability of subsistence harvesters to meet their needs. The magnitude, duration and intensity of the sac roe fishery also have a major impact on the movements of herring schools and their spawning patterns. More efforts need to be taken to adjust the way the fishery is managed to ensure the State is in compliance with its subsistence priority regulations.

DECLINING COMMERCIAL VALUE

The economics of this fishery are on a downward trend similar to that of the stock's biomass. The 2014 ex-vessel value of \$180 per ton is the lowest recorded in the last 22 years. A significant decline in the traditional kazunoko (salted herring roe) market and an increase in the harvest of herring throughout the Pacific have combined to make herring one of the least valued fish per pound in Alaska. These low values reinforce the findings of the report titled "Little Fish, Big Impact" (published by the Lenfest Forage Fish Task Force from the Institute for Ocean Conservation Science at Stony Brook University) which indicates that forage fish, such as herring, are worth twice as much left in the water as prey for other commercially valuable fish as they are in direct fisheries.

The value of sac roe herring would be even lower if it wasn't for the increase in fishmeal prices. The decline of the Peruvian anchovy stocks combined with the increased demand for fishmeal from fish farming operations have resulted in a three-fold increase in fishmeal prices over the last ten years. Traditionally, the commercial value of the fishery has been in the roe, which makes up about 12 percent of the harvest by weight. The remaining 88 percent (whole males and females with roe extracted) is considered bycatch and is being turned into fishmeal which supports farmed fish operations.

In October of this year, Dr. Shingo Hamada, of the Research Institute for Humanity and Nature in Kyoto, Japan, gave a presentation to the STA Tribal Council on the history surrounding the decline of Japanese herring stocks, current marketing practices and uses of herring in Japan, and the development status of herring hatchery production. Dr. Hamada's research indicates the sac roe herring harvested in Canada and Southeast Alaska that are shipped to China and Japan in the round, are processed to extract the roe and turn the flesh into fishmeal.

The extremely low value of Sitka Sound sac roe herring, their importance as an ecological and cultural keystone species, and their immense value to indirect fisheries (salmon, halibut, sablefish, etc.) mandate a change in how this resource is managed. STA firmly believes these fish are of maximum benefit to **all Alaskans** left in the water supporting the ecosystem and other user groups. Furthermore, STA questions whether any attempt to prosecute a sac roe fishery would be a violation Article VII Sec. 2 of the Alaska Constitution that states, *"The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people."*

STA believes that the survival of Southeast Alaska herring stocks depends on taking a more conservative approach in the way it manages this invaluable cultural and ecological keystone species.

Sincerely,



Michael Baines
Council Chairman

ALASKA DEPARTMENT OF FISH AND GAME

DIVISION OF COMMERCIAL FISHERIES

NEWS RELEASE



Cora Campbell, Commissioner
Jeff Regnart, Director



Contact:
Dave Gordon

Sitka Area Office
304 Lake Street, Room 103
Sitka, Alaska 99835

Phone: (907) 747-6688

Date: December 15, 2011

Fax: (907) 747-6693

Time: 4:15 p.m.

SITKA SOUND HERRING FISHERY ANNOUNCEMENT

Sitka. . . The Alaska Department of Fish and Game announced today the preliminary guideline harvest level (GHL) for the 2012 Sitka Sound sac roe herring fishery is 29,008 tons. This GHL is based on a 20% harvest rate of the forecast biomass of 145,042 tons of mature herring. The forecast indicates that the spawning stock will consist of 13% age-3, 24% age-4, 25% age-5, 14% age-6, 11% age-7, and 13% age-8 and older herring.

The department uses an age-structure-analysis (ASA) model to estimate abundance, survival rates and maturation rates needed to forecast the biomass of mature herring expected to return to Sitka Sound the upcoming spawning season. The ASA model uses a long time series of abundance and age composition data from department surveys conducted during and following the spring fishery. Herring abundance is estimated using aerial surveys designed to map the length of shoreline receiving spawn, and dive surveys which estimate the density of eggs and the average width of the spawn. The department documented 78.3 nautical miles of herring spawn in the greater Sitka Sound area in the spring of 2011. Spawning herring sampled in the spring of 2011 showed an age composition of 7% age-3, 26% age-4, 23% age-5, 24% age-6, 13% age-7, and 8% age-8+. The ASA model estimates that 132,000 tons of herring spawned in the Sitka Sound area in the spring of 2011 and the commercial sac roe herring harvest was 19,430 tons for a total return of 151,430 tons.

The forecast and GHL for the 2012 fishery will be finalized using average weight-at-age from sampling of the winter test fishery, to be conducted during the January 2012. The final forecast will be announced in late-February.

News releases web site: <http://www.adfg.alaska.gov/index.cfm?adfg=cfnews.main>.

Office	Ketchikan	Petersburg	Wrangell	Sitka	Juneau	Haines	Yakutat
ADFG	225-5195	772-3801	874-3822	747-6688	465-4250	766-2830	784-3255
AWT	225-5111	772-3983	874-3215	747-3254	465-4000	766-2533	784-3220

Dear Vice-Chair Kluberton and the Alaska Board of Fisheries,

As a stakeholder in the marine ecosystem and the health of the local economy, we, the undersigned, firmly support these important proposals regarding herring management in Southeast Alaska:

Proposals 114 and 115—I support this region-wide proposal to require herring stocks to be above their minimum stock biomass for five consecutive years before a sac-roe fishery (seine or gillnet) can occur. Removing fishing pressure for an extended period of time will allow these stocks a greater opportunity to build back to historic levels. The closures of all sac-roe fisheries except Sitka Sound this year shows that depleted stocks need more time to recover.

Proposal 118—I support this proposal to only harvest 50% of the Guideline Harvest Level over 25% of the anticipated nautical miles of spawn before a temporary commercial closure. This proposal would slow down the rate of commercial harvest, allowing greater opportunity for subsistence harvesters to meet their needs.

Proposal 121—I support this proposal to increase the size of the subsistence only zone in Sitka Sound. The closure has helped subsistence harvesters to meet some of their needs, but more area is necessary for subsistence harvesters to continuously meet their needs.

Proposal 125—I support this proposal to reduce the harvest rate to 10% and to place a cap on the commercial sac-roe harvest at 10,000 tons. This will increase the economic value of the roe harvested and leave more herring in the water to support the ecosystem and subsistence harvesters.

Despite these excellent proposals to sustain commercial and traditional herring industries, there are several proposals which will remove conservation measures put in place by the Board of Fisheries. These proposals will crash the Sitka Sound herring populations, ruining both commercial and subsistence livelihoods. We, the undersigned, do not support the following proposals:

Proposals 116 and 117—I do not support this proposal which would reduce the Amount Necessary for Subsistence (ANS). The results of ADF&G Division of Subsistence herring harvester survey shows that the ANS is achievable, and that there is a high frequency of needs not being met.

Proposals 119 and 120—I do not support this proposal to close the subsistence only area in Sitka Sound. This proposal would remove existing protections that make it possible for subsistence harvesters to meet their needs.

Proposal 122—I do not support this proposal to reduce the biomass threshold for the Sitka stock from 25,000 tons to 20,000 tons. This proposal would remove existing conservation measures enacted by the Board of Fisheries and will be detrimental to the health of the marine ecosystem.

NAME	SIGNATURE	DATE
Willow Brown	Willow Brown	2-20-15
Jean Swanson	Jean Swanson	2-20-15
Galadriel Morales	Galadriel Morales	02/20/2015
Walleen R Williams	Walleen Williams	2-20-15
Drian James	Drian James	2/20/15
Christine Paul	Christine Paul	2/20/15
Doug Bartels	Doug Bartels	2-20-15

