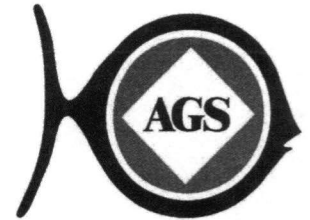




## ALASKA GENERAL SEAFOODS

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RC 099



January 12, 2018

Alaska Board of Fisheries  
John Jensen – Chair

**Re: 2018 Southeast Finfish, Board of Fisheries Herring Proposals 95, 96, 98, 99, 100, 105 & 106.**

Chairman Jensen and Board Members:

Alaska General Seafoods has been a participant in the Sitka Sound sac roe fishery continually since 1990. Our participation in the fishery over the course of those years, has supported fishermen, tenders, local businesses, the City and Borough of Sitka as well as the State of Alaska. The financial multiplier of just one processor like ourselves, supports the economic activity of many. We are proud of this and want this to continue into the future. Many of the herring proposals threatened those who economically rely on commercial herring fishing, and seek to harm Alaska's reputation for sustainable management.

In our tenure as a processor in the Sitka Sound Sac Roe Fishery we have found management of the fishery by ADF&G to be conservative and based on sound scientific information to evaluate and manage the fishery. As processors, we are fully dependent on sustainable management to carry Alaska's fisheries into the future. Therefore, we are opposed to the proposals described below.

Proposals **95, 96 & 100** seek to eliminate and amend other Southeast Alaska commercial sac roe fisheries. ***Alaska General Seafoods, OPPOSES Proposals 95, 96 & 100.***

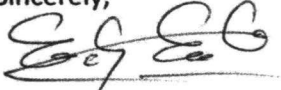
***We would like to offer comment on proposals 98, 99, 105 & 106 which we are also opposed to.***

**Proposals 98 & 99: Seek to modify the existing GHL to reduce the harvest rate of herring in areas of Southeast Alaska including Sitka.** ADF&G has always managed herring fisheries in Southeast Alaska and throughout the State in a conservative and sustainable way. They have done this using sound and verifiable science, qualified fishery biologists and strong data. There is no reason to change the way ADF&G manages the State's sustainable herring fisheries unless their current methods of study justify this. ***We are OPPOSED to Proposals 98 & 99. We oppose actions that are based on politics and not science.***

**Proposals 105 & 106: Seek to expand the closed water area in Sitka Sound to commercial herring fishing.** This area was established at the 2012 BOF meeting in Ketchikan. In discussion with industry, a board generated proposal was submitted and subsequently adopted as the area currently in place. Now, more area is being requested. Expanding this area will make it more difficult to achieve the GHL in any year and threatens to have a negative impact on the economics of the fishery for those mentioned in the opening paragraph. Expanding the closed area will restrict ADF&G's ability to manage the fishery for all users to the best of their ability. ***We are OPPOSED to Proposals 105 & 106.***

Thank you for the opportunity to present our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sandy Souter', with a horizontal line underneath.

Sandy Souter  
Manager – Fishing Operations  
Alaska General Seafoods Inc.