


PACIFIC SEAFOOD PROCESSORS ASSOCIATION
 Est. 1914

January 12, 2018

Alaska Board of Fisheries
 John Jensen, Chair
 Via email dfg.bof.comments@alaska.gov

RE: 2018 SOUTHEAST FINFISH, BOARD OF FISHERIES HERRING PROPOSALS

Chairman Jensen and Board Members:

Thank you for the opportunity to comment on herring proposals during the 2018 Southeast cycle. While there are a multitude of proposals with potentially significant effects on the management of commercial fisheries in Southeast, proposals 98, 99, 105, and 106 encompass core issues that will directly affect fishermen, processors, and communities reliant upon the commercial herring fisheries. **PSPA opposes proposals 98, 99, 105, and 106.**

PSPA is a nonprofit seafood trade association representing seafood processing businesses and their investment in coastal Alaska, including three shorebased processors located in Ketchikan and Sitka. In addition to shorebased processors, fishermen, tenders, support vessels, support businesses, transportation companies, the City and Borough of Sitka, and the State of Alaska (through fish taxes) are dependent on the direct and indirect economic activity that the commercial herring fisheries provide.

Proposals 98 and 99 have varying levels of effect, but both substantially modify the existing GHF formula used by ADF&G and reduce the maximum allowable harvest rates for all herring fisheries in Southeast Alaska. The Sitka Sound sac roe herring fishery alone has generated a total of \$70 million in ex-vessel revenue over the last decade. ADF&G staff comments indicate a resulting reduction in GHFs in Sitka Sound of up to 63%, and a loss of \$27 million in ex-vessel revenue in Sitka Sound and an additional \$9 million for all other Southeast areas had these proposals been in place the last ten years. PSPA does not support this action, in recognition that current harvest rates for the herring population were designed to be conservative and sustainable based on comprehensive historical data. And because there is a general understanding of the importance of herring and other forage fish to ecosystem processes, the current harvest limits account for predation as they are based on models that include average natural mortality of herring over time. Alaska's commercial fisheries have been sustainable and diverse over time because of our commitment to sound science through the use of best available data and the expertise of our fishery scientists and managers to regulate fisheries appropriately and

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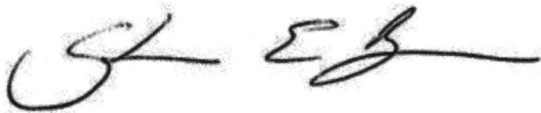
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responsively. Staff comment reiterates that the current harvest strategy is based on the best scientific information available to Alaska and already contains conservation provisions to protect herring stocks and their role in the ecosystem.

Proposals 105 and 106 would expand the closed water areas for the commercial sac roe herring fishery in Sitka Sound. This area was established at a previous BOF meeting in 2012. While the exact effects of the proposals are uncertain, it is highly likely that in any given year due to spawning distribution and timing, these proposals would risk not achieving the GHL, harvesting lower quality fish, and/or lengthening the duration of the fishery and increasing costs. Absent a scientific basis for doing so, it is not reasonable to expand the closed areas for no appreciable benefit. Importantly, we must recognize that ADF&G currently manages the herring fisheries to be responsive to the concerns and needs of subsistence users both inside and outside of closed waters, and has not only the authority, but is directed to, distribute the commercial harvest, by time and area, as necessary to ensure a reasonable opportunity to harvest ANS for herring spawn. Closing further areas to commercial fishing further restricts ADF&G's ability to effectively manage the fishery and would substantially impact current participants reliant on the commercial sac roe herring fishery.

Thank you for your consideration of our comments and for your public service.

Sincerely,



Glenn Reed
President