

20 January 2018

To The Alaska Board of Fisheries:

I am an environmental social scientist, previously employed by the ADFG (Subsistence Resource Specialist I-II) and the University of Alaska Southeast (Professor), and presently Director of the Environmental Change & Management Programme, University of Oxford, UK. Recently I have served on the Herring Working Group of the Ocean Modelling Forum (<http://oceanmodelingforum.org/working-groups/pacific-herring/>) with members of the ADFG, STA, SHCA, and representatives of the herring processing industry in Sitka. I was also the lead author of a major Herring Synthesis Study (NPRB #728: <http://herringsynthesis.research.pdx.edu/>) from which numerous peer-reviewed joint-authored publications have been generated (of special relevance to Sitka see Thornton and Kitka (1015): <https://www.igi-global.com/article/an-indigenous-model-of-a-contested-pacific-herring-fishery-in-sitka-alaska/121573>) On the basis of my and other research, I urge the BOF to:

Oppose Proposal 94; Support Proposal s 105, 106: Proposal 94 is a disingenuous effort by the industry to devalue subsistence and thus undermine opposition to the sac roe fishery. The ANS has been met consistently when a high number of spawning days and quality spawning sites near town are available for herring egg gathering. It is not met when such opportunities are not extant. Commercial fisheries, take 99+% of the harvested herring. Subsistence needs more (not less!) protection for its needs which provide real physical, social, and cultural health benefits to Sitka and beyond (among highest sharing and secondary distribution of any subsistence resource).

There is also evidence that Tlingit practices of placing substrate in fact aids herring spawning by providing quality habitat which is only selectively harvested, thus creating no adverse impact on (and potential enhancement of) herring reproduction. Certainly, the practices of cultivating herring to lay eggs on branches has no adverse effect on the reproductive success of the herring as practiced in customary and traditional fashion and levels. This is a reason to support Proposals 105-106 which call for an expansion the subsistence only or commercial no-take zone to include a larger areas (but still a small minority) of the subsistence area traditionally used for cultivating herring spawn (Thornton and Kitka 2015)

Support Proposal 98 & 99. The record of management with the 20% GHM is glaringly unsuccessful. All areas are now closed to commercial sac roe fishing except Sitka, where both commercial and subsistence "quotas" are increasingly not being met. This represents an unhealthy situation which has actually been produced by the 20% harvest model, both in AK and BC. By harvesting a lower percentage, in line with precautionary principles of no more than 10% of the spawning biomass as spelled out by the blue ribbon LENFEST Forage Fish Task Force Report (<http://www.lenfestocean.org/en/research-projects/lenfest-forage-fish-task-force>) healthier herring populations will be restored. In Southeast this will improve the fishery in the long run for all concerned, especially when combined with higher minimum thresholds. The region has lost more than 1,000 miles of spawning coastline since intensification of commercial herring fishing in the late 1920s (cf. Herring Synthesis report).

Thank you,



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