

Copy of Kyle Rosendale's Testimony

Hello, my name is Kyle Rosendale and I am a Fisheries Biologist for the Sitka Tribe of Alaska. I am here today to speak in opposition to Proposal 94. Please see PC147 for more information.

Herring eggs are a celebrated and popular traditional food. STA's 2017 Tribal Needs Assessment indicated that herring eggs were the traditional food consumed by the second-most Tribal Citizens, trailing only salmon. TEK and archaeological evidence indicate that herring were once ubiquitous and widely used in Southeast Alaska. Before reduction fisheries began in the 1880s, nearly every village in Southeast had a thriving herring population and abundant subsistence harvest of herring eggs. However, after the severe decline and near extirpation of many Southeast herring populations, Sitka Sound is now the only herring population that consistently provides a significant subsistence harvest of herring eggs. Sitka eggs are shared widely across Southeast and the rest of Alaska.

Currently, the ANS is based on data collected by ADF&G's Division of Subsistence. These are the best available data with which to determine the ANS. The ANS has been met in only seven of the fifteen years with data available. The ANS has been met in only three of the past ten years.

The proposal gives no reasonable justification for reducing the ANS and no rationale for the ANS thresholds suggested. The 2016 ADF&G subsistence harvest survey indicated 97% of eggs harvested were shared; there is demand for additional eggs, but subsistence harvesters haven't been able to obtain those eggs in recent years.

The proposal suggests that effort is the reason for declining harvest. However, STA believes that number of sets is a better unit of effort than number of participants, given the prominence of "superharvesters" in the fishery. STA's Traditional Foods Program distributes herring eggs to Tribal Citizens and tracks its number of sets and its harvest of herring eggs. In the early 2000s, STA staff estimate that STA would make approximately 15 sets and harvest 4,000 to 5,000 pounds of eggs. In 2016, STA made 31 sets and harvested 3,600 pounds. And in 2017, STA made 33 sets and harvested less than 1,300 pounds. While the ADF&G survey does not collect CPUE data on herring egg harvest, STA's experience is corroborated by other subsistence users.

Additionally, TEK suggests that as the GHL and fishing pressure have increased, the temporal duration of high-quality spawn has decreased. In the 2016 harvest survey, over 40% of previous harvesters who were unable to harvest listed "working/no time" as the reason they were unable to harvest. This suggests that people want to harvest, but the duration of high-quality spawn available for subsistence harvest has contracted such that many interested potential harvesters are unable to attempt to harvest. Spatial and temporal changes in spawn, not harvester effort, are responsible the decline in subsistence harvest.

If adopted, Proposal 94 would mean that subsistence needs would have been met in every single year in which subsistence harvest data are available. This is simply "moving the goalposts" in an attempt to mitigate a legitimate concern of subsistence harvesters.

Thank you for your time and your thoughtful consideration.

Kyle Rosendale