



RC 366

North Pacific Fisheries Association
P.O. Box 796 · Homer, AK · 99603

To: State of Alaska Board of Fisheries
Re: Opposition to Proposals 95, 96, 98, 99, 100, 105 & 106

1/11/87

Dear Chairman Jensen and Members of the Board of Fisheries,

The North Pacific Fisheries Association (NPFA) was founded in 1955 and represents over sixty Alaskan fishing operations. Many of these operations participate in the Southeast herring fishery and depend on it as part of their fishing season. NPFA members include Southeast Herring permit holders, vessel owners, tender vessel owners, harvesters and tender deckhands. Some of our members having participated for decades and we all support a sustainable fishery for the future. NPFA has a long history of supporting conservative, science based fisheries management and has demonstrated this philosophy by engaging with the regulatory bodies from local to international.

NPFA is opposed to Proposals 95, 96, 98, 100, 105 & 106 and asks that the board take no action. NPFA is an Alaskan group and we respect traditional uses of fishery resources, these proposals, however seem to put unnecessary constraint on the fishery without definitive benefit to the traditional users. The ADF&G Staff comments (RC2) Page 302 states **"The current harvest rate strategy is based on the best scientific information available for Alaska and contains conservation provisions that are beneficial to herring and the ecosystem."** We trust in ADF&G fisheries management and hope the members of the Board continue to do so as well.

As far as the proposals to further limit the area available to prosecute the fishery, we again refer to RC2 Page 311 **The department is also directed in the *Sitka Sound commercial sac roe herring fishery (5 AAC 27.195)* to distribute the commercial harvest, by time and area, if the department determines that it is necessary to ensure a reasonable opportunity to harvest the amount of herring spawn necessary for subsistence uses specified in *Customary and traditional subsistence uses of fish stocks and amounts necessary for subsistence uses (5 AAC 01.716)*.** In our opinion ADF&G has the tools necessary to ensure the subsistence. Additionally and the analysis points out **"the full effects of the proposal on the subsistence fishery for herring spawn are not clear since a number of factors unrelated to the commercial harvest may influence the success of the subsistence harvest."** The Board should not adopt these proposals as the proper tools already exists.

Respectfully,

G Malcolm Milne

President, North Pacific Fisheries Association