

## ALASKA HERRING CONSERVATION ALLIANCE



P.O. BOX 61  
Sitka, Alaska 99835  
Tel. No. 907-738-3509

January 22, 2018

Board of Fish

### **Re: Forage Fish Regulation and History in State of Alaska**

Dear Chairman Jensen and Board of Fish Members:

In 1998, the board of fish adopted 5 AAC 39.212. Forage Fish Management Plan which established nine marine fish families as forage fish. These nine families, including sand lance, euphasids, capelin and six others were not commercially harvested at the time, and therefore by definition would be excluded from existing or future commercial fisheries. At the same time the board of fish intentionally did not include herring, shrimp, and Pollack, among many other species in 5 AAC 39.212. Forage Fish Management Plan; they were precluded because they had existing fisheries and management plans. Existing/ongoing fisheries were left out recognizing that ADF&G had biologically driven, abundance based management plans on those species. Designation of a family in the FFMP dictated it would not be developed for commercial harvest. This designation was not definitional in the sense of species or marine fish-family ecological niche. The goal was and should be sustainable management and scientifically based harvest guidelines.

Therefore, arbitrarily changing one species within Clupeidae to forage fish introduces considerable confusion and additionally overturns a former board of fish action that was consistent and logical. RC 365 appears to be more than semantics, or put forth for the sake of clarity, otherwise why not modify the entire Forage Fish Plan using the biological definition of forage fish. RC 365 has an ulterior motive in a two step process, 1) put herring into Forage Fish Management Plan, 2) at a later date eliminate herring harvest as per other nine families in management plan.

Furthermore:

- a) There is no conservation concern. Togiak herring are healthy and booming; Sitka Sound herring have increased in biomass since the state began managing it in 1960. The increase biomass of the Sitka Sound herring has been dramatic, by a factor of ten since statehood. The 2016 estimated stock biomass is 78,372 tons, just under the recent ten-year average.

Herring like most populations have highs and lows, but most importantly the state manages on abundance, using principles of precautionary management, sustainability, and good science.

- b) The Board of Fish did not make an error in 5 AAC 39.212. Forage Fish Management Plan, but rather the Board made a conscious decision to continue sustainable commercial fisheries on herring and Pollack. These are fisheries that communities from Nome to Kodiak to Metlakatla depend upon for economic survival.
- c) Since the 1998 FFMP, Sitka Sound herring biomass has doubled in the intervening 16 years, and Togiak herring biomass is even larger.

RC 365 is inconsistent with the current language in 5 AAC 39.212. Forage Fish Management Plan. It is true the language for inclusion of herring can be massaged to be the one exception in the FFMP, but for what biological, sustainability, or clarity/consistency reason?

Thank you for your consideration in this matter.

Sincerely,



Steve Reifensuhl  
Executive Director SHCA

Reference for Management Plan:

[http://www.legis.state.ak.us/basis/folioproxy.asp?url=http://wwwjnu01.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=\[JUMP:'5+aac+39!2E212'\]/doc/{@1}?firsthit](http://www.legis.state.ak.us/basis/folioproxy.asp?url=http://wwwjnu01.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=[JUMP:'5+aac+39!2E212']/doc/{@1}?firsthit)