

Sitka Tribe of Alaska submits the following amendment to its proposal 99.

RC 389

5 AAC 27.160. Quotas and guideline harvest levels for Southeastern Alaska Area

1) ISSUE

The current guideline harvest level (GHL) for the Sitka Sound sac roe fishery is exceeding market demand and is one of the variables affecting subsistence herring egg harvesters' ability to meet their needs or the amount necessary for subsistence.

ADF&G data suggest that the Sitka Sound herring biomass was on an upward trend starting 1995 and peaked in 2009. This reported increase in biomass combined with the Board-approved maximum harvest rate of 20% has significantly increased the annual GHLs. The length, duration, and intensity of the fishery have increased substantially in an attempt to harvest these excessive GHLs. Sitka Tribe of Alaska firmly believes that this increased fishing effort is disrupting the spawning patterns of herring in the Sound and is causing a high frequency of subsistence herring egg harvester needs not being met.

WHAT WOULD HAPPEN IF NOTHING IS DONE?

There will continue to be a high frequency of subsistence herring egg harvesters' needs not being met.

OTHER SOLUTIONS CONSIDERED

Sitka Tribe of Alaska advocated for a moratorium until 2002. Sitka Tribe of Alaska has continued to work within the Board of Fisheries process to seek a reasonable opportunity for the subsistence harvest of herring eggs. The original version of Proposal 99 requested a 10% harvest rate cap. With this amended version of Proposal 99, Sitka Tribe of Alaska is offering a compromise that still allows for substantial commercial harvest when the biomass of Sitka Sound herring is high. Lastly, Sitka Tribe of Alaska cannot support anything in excess of the harvest rate formula used for all other Southeast Alaska herring populations. If the offer to support the Southeast harvest rate formula is refused, we feel we have exhausted all administrative processes within the Board of Fisheries to protect a reasonable opportunity for subsistence harvest of herring eggs.

2) RECOMMENDED SOLUTION

(g) The guideline harvest level for the herring sac roe fishery in Sections 13-A and 13-B **will** [SHALL] be established [BY THE DEPARTMENT] and will be a harvest rate percentage that is not less than [12] **10** percent, not more than 20 percent, and within that range shall be determined by the following formula:

[HARVEST RATE PERCENTAGE = 2 + 8 [SPAWNING BIOMASS (IN TONS)] /20,000]

[Harvest Rate Percentage = 8+2 [Spawning Biomass (In Tons)]/Threshold Level]

The fishery will not be conducted if the spawning biomass is less than 25,000 tons.