RC 016

Dear members of the Board of Fisheries:

We would like to show our support for Proposal 114, requiring that depressed herring populations are above the minimum biomass threshold for a fishery for five consecutive years before that fishery can re-open. The projected returning herring biomass across Southeast Alaska is terrifyingly low; we need to reduce pressure on our depressed stocks. Instead of an ocean-based game of "Whack-A-Mole", where we immediately knock down any population that peeks above the minimum threshold, we should support long-term growth by allowing those stocks several years to increase.

It's undeniable that our herring populations are on shaky footing. According to ADF&G's preliminary biomass projections, Sitka Sound is the only herring fishery that will support herring openings this year. With a projected returning biomass of 44,237 tons, we seem comfortably above the minimum threshold of 25,000 tons. However, it's hard not to remember that last year, the returning biomass was over 50,000 tons and the year before, it was over 80,000 tons. With the trend pointing steeply downwards, perhaps we shouldn't be so comfortable after all. Meanwhile, other areas in Southeast are far, far below the necessary amount to support fisheries. Seymour Canal is predicted to have 1,666 tons, just over half the 3,000 tons necessary for a fishery. West Behm Canal is similarly close to half the minimum biomass threshold. Even worse, Hobart Bay is projected to have only 110 of the 2,000 tons necessary for a fishery. We may not be responsible for depleting these stocks. We may not even know why they are depleted, but that's entirely unimportant. What is important is that Southeast populations are highly depressed and that we need to have regulations in place to help them recover. Proposal 114 is an important step toward creating an environment where herring populations can rebuild.

The Alaskan numbers certainly support more conservative herring management, but global scientific studies also agree that forage fish need to be harvested more cautiously. Forage fish are primary consumers in the marine ecosystem - proving the most important pathway for energy stored in plankton to make its way higher in the food chain. The study "Little Fish, Big Impact" by Stony Brook University concluded that in light of forage fish's importance to the larger food chain, minimum biomass thresholds for harvest should be doubled and harvest rates cut in half. While such drastic action may not be recommended for Southeast Alaska specifically, the wait time mandated by Proposal 114 provides some of the same protections that a higher minimum biomass threshold would.

Thank you very much for your time. We urge the Board to look at the decline of Southeast Alaskan herring fisheries and to take steps to support herring's long-term recovery. Please vote to approve Proposal 114.

Sincerely,

Sitka Conservation Society