

December 20, 2021

Dear Commissioner Doug Vincent-Lang,

The Sitka Fish and Game Advisory Committee was formally convened by the Alaska Department of Fish and Game to advise on topics of concern related to fisheries, wildlife and local resource management that directly impact the community of Sitka. The Sitka AC is composed of 17 publicly elected stakeholders from a wide range of user groups who rely on fish and wildlife resources whether it be for subsistence, sport, or commercial purposes. Our members represent a diverse range of viewpoints but all feel that responsible management of these resources are of paramount importance to our community, and communities across southeast Alaska.

All of our committee members' livelihoods and ways of life are directly connected to the health of our fisheries resources as a whole. These stocks are also tremendously important for community resilience and for food security across Alaska, as we have been reminded over the past two years of the Covid-19 pandemic. Herring are one of the most important species in our ecosystem because they support so many other species we rely on, particularly our Salmon. The topic of herring has become more controversial and politically charged in the past few years and the meetings addressing regulations in this fishery have become a significant undertaking.

ADF&G staff were present during our recent AC meetings in which we began discussing Southeast Alaska herring proposals that primarily affected our area. Our volunteer committee has now spent more than 16 hours over 5 meetings discussing Sitka herring. We commend agency staff for their dedication, and for being present with us throughout these many meetings. During committee discussion we became aware that department funding limitations are impacting crucial research and limiting the ability of our staff biologists to give us the best available science as we weigh in on these important management changes. This creates doubt in the accuracy of the data along with the model and associated threshold levels. as well as the whole overall herring harvest strategy. These concerns only degrade public trust and threaten the integrity of the entire process.

During our discussions we became aware that the data set used to support the current overall harvest strategy is from the most recent re-evaluation, including the most recent survey of unfished biomass, which was last conducted in 1998. During the public meeting, it was made clear that this data set including the overall population, the calculation for natural mortality, the calculation and adjustments for age class recruitment- all of this is based on a picture of the ocean from 20 years ago. We know much has changed since 1998: warming water, ocean acidification, seabird die offs related to food chain issues with forage fish abundance, the "blob" among other things. At the very least the natural mortality adjustment would certainly need to be recalibrated. Things are not adding up correctly, and it is not just one piece of that whole system,

as presented in a few proposals, that needs adjusting. The whole overall herring harvest strategy needs to be recalibrated to reflect the current state of the ecosystem and to make adjustments for the changes in ocean conditions that have been occurring over the past 20 years.

Without additional funding to the department to do this major survey and enough staff to properly support the required work, these adjustments cannot be made and we cannot know for sure if we are currently on point with the management of this resource. Without supporting this work how can we as an advisory committee, and you as responsible party for proper management of the state fisheries resources, defend this fishery on the basis of science based management if our data is decades old and outdated?

The herring that cycle through Sitka Sound and the surrounding waters are vital to the health of this area, our community, and many other communities across southeast Alaska. Herring are an invaluable forage fish and subsistence resource. They also support a longstanding commercial fishery. In order for herring populations to stay sustainable we need ongoing, up to date research. Users and advocates need to be confident that ADF&G has the quality data they need to make these crucial decisions that directly impact our community and our way of life.

Therefore Sitka Fish and Game Advisory Committee is making the following request for additional funding to be given to the ADF&G Commercial Fisheries Division and be directed specifically to Southeast Region Herring management to help address local concerns and support sustainable herring management.

1. Funding for a major survey to acquire a current population estimate of unfished biomass of herring and a reevaluation of the whole overall "Herring harvest strategy" including natural mortality, age class recruitment, an assessment of the model, and of the current thresholds. This reevaluation will also help address whether current management is as spot on, or if some things need to be adjusted.
2. Long-term funding for a Biometrician III that can finish developing a Bayesian statistical catch at age model. And any additional staff support needed to accomplish this work.

The Bayesian model will

1. Be used for conducting annual stock assessments to forecast Sitka herring biomass, upon which the guideline harvest level will be based.
2. Be used to re-evaluate the estimate of unfished biomass, which provides the basis for determining the Sitka harvest threshold. The current estimate is based on data from the 1970's to mid 1990's.
3. Provide the operating model which can be used as part of a re-evaluation of the harvest rate strategy.

Once this model is fully developed it can also be applied to assess other herring stocks and other species.

2. Support for the Subsistence Division- As you know the ADF&G Division of Subsistence is responsible for documenting subsistence uses, estimating harvest levels and assisting the AK BOF & BOG to provide opportunities for customary and traditional uses of fish and wildlife resources. The importance of this division can not be understated and after receiving input from their division we are requesting funding for their following projects, both of which would be useful for herring management and better data related to subsistence use.

1. Project focused on understanding sharing patterns of herring eggs.
2. Household level analysis of changes in herring egg harvest over time.

The Sitka AC is asking for your help in supporting this critical work. This letter is an attempt to address and mitigate some of the long standing conflicts over this resource within our community, and to support sustainable management of our herring stocks. While it may not entirely solve this problem, we do think getting the additional funding to the department to support updated research would be a step in the right direction. Supporting the funding of this research would be better for the herring and will help restore some trust in the department in their management of this keystone species so culturally, economically, and ecologically important to the longevity of this community.

Thank you for your time and consideration.

Respectfully,



Heather Bauscher

Chair, Sitka Advisory Committee to ADF&G

CC:

Governor Mike Dunleavy

Senator Bert Steadman

Representative Jonathan Kreiss- Tompkins