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BOARD OF FISH COMMENTS 2013
Alaska Department of Fish and Game
Board Support Section
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Total Pages 2

Proposal 243-I support this proposal.

For all the reasons you have already read and heard many times, I agree that Pacific herring should be listed in the Forage Fish Management Plan. What is interesting is that, not just commercial herring fishers, all gear groups want a say in how the herring resource is managed as they feel healthy herring stocks are vital to their survival. Formally recognizing Pacific herring as a forage fish would be an important first step as it can bring all stakeholders to the table when decisions affecting the health of herring stocks are being considered. Also, it may bring additional protection to herring populations being adversely affected by activities other than commercial harvest. These activities include such things as fish hatchery release of salmon smolts into critical juvenile herring habitat; the uncontrolled expansion of human occupation, both residential and industrial, impacting herring; and control of invasive species, such as *Didemnum Vexillum*.

The 2012 herring fishery at Sitka was a disaster in terms of the Alaska Department of Fish and Game's erroneous prediction of the herring biomass, the seiners harvesting less than half the Gross Harvest Limit (GHL), and the subsistence herring fishers having no opportunity to achieve a successful harvest. Many are saying we are on the verge of the herring resource collapsing while many are saying the herring resource has already collapsed, as it has in other places in southeast Alaska. And what will be done if the GHL for this year, which was arbitrarily lowered from the number spit out by the ASA model, is not met? A logical progression is that the GHL will continue to be lowered until there is no more. Clear to many, the ASA model is broke and needs to be fixed. The Sitka herring fishery is being managed for the single purpose of providing a commercial harvest for 48 permit holders. What is at stake is a very large part of the ecosystem affecting hundreds of gear holders and thousands of people. Scientists recommend a move away from single-species based fisheries management system to an eco-based fisheries management system. A lengthy task and what to do with the sac roe fishery in the meantime? Ideally, a moratorium of the sac roe fishery until all studies is complete and put into effect. If this cannot be done then, as Sitka Tribe of Alaska recommends, follow the 2012 Lenfest Forage Fish Task Force report titled "Little Fish, Big Impact" which recommends a harvest rate of one-half the maximum sustained yield

and not to exceed 10%. This would change this year's GHL currently set at 11,055 tons to 7,370 tons.

This is not the first time you have heard this. It has been talked around before and while many agree, nothing is being done. Strong leadership is needed. Difficult choices must be made. What greater impetus can there be to act to save the herring resource than being witness to the fishery falling flat in front of you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Al Wilson', with a long horizontal flourish extending to the right.

Al Wilson