

March 19, 2013

Page 1

RC 47

Proposal 243

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March 19, 2013

Board of Fish through Chairmen Johnstone:

The following should be considered while deliberating proposal 234. With the exception of Alaska I believe the entire western world acknowledges Herring are a forage fish. It is my studied opinion, the continued misidentification of these trophically important forage fish by the state of Alaska utterly and completely undermines the entire current existing forage fish management plan. It is in the best interest of all consumptive users of herring, to correct this error in regulation as soon as possible.

Admittedly the state adopted this plan in order to preserve all listed forage fish. These fish perform a critical role in our marine ecosystem, and there is absolutely no legitimate reason why herring shouldn't be considered. The board already finds and acknowledges that abundant populations of forage fish are necessary to sustain healthy populations of commercially important species of salmon, groundfish, halibut, and shellfish; as set forth in 5 AAC 39.212.

I'd like to point out department staff has gone on record stating, "Because of the presence of historical commercial fisheries, herring are not considered forage fish in the federal management plan." This is misleading, and I have taken it upon myself to do some research in order to set the record straight. I visited the North Pacific Fisheries Management Council's achieves here in Anchorage and retained a copy of amendment 16a. which clearly defines 'herring savings areas' which offer protection of wintering herring from bycatch, and prohibits directed fishing of herring.

I spoke on the phone at length with Josh Keaton with National Marine Fisheries Service - Sustainable Fisheries Division- (907) 586- 7519 and he is under the impression the herring saving areas were established in order to reduce the amount of pacific herring that are caught in the Bering Sea because of their crucial role in the marine food web. Josh further stated that pacific herring are a "prohibited species" and directed fishing is prohibited in federal waters.

The Board of Fisheries' main role is to conserve and develop the fishery resources of the state. Recognizing this I believe this is a straightforward change that needs to take place in order for the ecosystem and other commercial fisheries to thrive.

RC 47

Why not acknowledge herring as a forage fish? The department has already attested at the last work session (October 9<sup>th</sup>, 2012) that adding herring as a forage fish would NOT change the way they manage herring fisheries.

Sincerely,

A handwritten signature in black ink, appearing to be 'A. Bean', written over a horizontal line.

Aaron Bean