



BOARD OF FISH PROPOSAL GUIDE

OUR RECOMMENDATIONS

SUBMIT YOUR COMMENTS BY 12/22/2021

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HERRING PROTECTORS

Board of Fish Herring Recommendations
comment @ herringcomments.com

Support
Proposals 156,
157, 158

Oppose
Proposals 159, 160,
161, 163, 164, 165

The Herring Protectors **strongly support** proposals 156, 157 and 158 submitted by the Sitka Tribe of Alaska.

These proposals would lead to safer management of the commercial herring fishery in Sitka Sound by better protecting population resilience. They represent thoughtful and actionable ways to make the current management paradigm less harmful.



The Herring Protectors **strongly oppose** Proposals 159, 160, 161, 163, 164 and 165 submitted by the Sac-Roe Industry.

These proposals lack good scientific justification, disrespect subsistence users and modern and traditional Tlingit knowledge, and run the risk of further damaging and reducing herring populations. If combined, they could be devastating.



We further believe that none of the proposals go far enough to advance respectful stewardship and protect the herring for generations to come.

SUPPORT

156

Changes the "harvest control rule" for Sitka, matching it to the rest of Southeast, dropping the min harvest % (when a fishery occurs) and sets a more gradual curve to the max harvest %. This fosters abundance by limiting commercial fishing in lean years.

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157

Ensures that no more than 20% of the herring over age 5 will be harvested in any year (157) & prevents the fishery from happening if 80% or more of the mature fish are only age 3 to age 4 (158).

158

This prevents older fish from being targeted or wiped out. Scientific literature and traditional ecological knowledge recognize the outsize importance of older, larger herring to the health of herring populations.

159

Removes ADF&G's obligation to "distribute the commercial harvest by fishing time and area if the department determines that it is necessary to ensure that subsistence users have a reasonable opportunity to harvest the amount of herring spawn necessary for subsistence." Court rulings in recent years established that ADFG has failed to implement this obligation. Now is the time to strengthen these words, not take them out.

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160

Reduces the size of the subsistence-only area where seiners can't fish close to Sitka. This small, near-town area is important to subsistence users and there has been no demonstrated loss to commercial users as a result of this protection.

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161

Requires a subsistence fishing permit to harvest herring roe on branches. Ample data and research demonstrates that subsistence users have suffered from vastly reduced access to herring roe. Alaska should not create more barriers to a sustainable cultural and subsistence practice.

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163

Turns the herring fishery into an "equal split" quota system where fishermen can fish wherever they want for two whole months, while doing catch & release to get the biggest fish. Would allow multiple permits to be used on one vessel (163) and would allow permit holders to over-fish their quota by 10% (with a 10% under-fish required the next year) (164).

164

This will result in a lower survival rate for older fish, more dead, injured and stressed out fish left in the water, and will support fewer jobs.

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165

Allows for un-fished herring quota from the normal season to be secured as "food or bait" from October through February and expands the fishing area to Cape Ommaney, instead of Cape Aspid. This would bring us back closer to a 1920's to 1960's era reduction fishery which nearly wiped out herring in Southeast entirely.

OPPOSE