

My name is Brian Lynch I'm the Executive Director of the Petersburg Vessel Owners Association. PVOA is a diverse group of over 100 commercial fishermen and businesses operating primarily in Southeast Alaska but our members participate in a variety of fisheries statewide. PVOA has submitted written comments on several proposals that are contained in PC-15. My testimony today focuses on the Board-Generated Proposal 243, Forage Fish Management Plan.

**PVOA OPPOSES this proposal** for two main reasons:

1. This proposal was originally presented as an Agenda Change Request (ACR-1) at the October 2012 Work session. ACR-1 was not accepted because it did not meet the criteria for acceptance as laid out in BOARD POLICY. Although ACR-1 was not accepted, The Board subsequently took the highly unusual and unwarranted step of developing a Board Generated Proposal to designate herring as a forage fish. Highly unusual because over the past 30+ years, we do not recall ever seeing this done, nor ever remember a Board-Generated Proposal that was not fully transparent and accepted by the public at the time it was generated. Due to the questionable nature of the origin of this proposal, the Board should take no action.
2. This proposal is unnecessary because fully developed management plans are currently in place for all commercial herring fisheries.
  - a. In 1998, the board adopted the FORAGE FISH MANAGEMENT PLAN that established nine marine fish families, to be excluded from commercial harvest. At the same time, the Board intentionally did not include several species for which ADF&G already developed and implemented biologically driven, abundance based management plans. So, adding them to the forage fish plan would simply be superfluous and actually contradictory.
  - b. Designation of a family in the Forage Fish Management Plan decreed it would not be subject to commercial harvest. This designation was not based on the role or ecological niche, but rather the goal was and should remain based on sustainable management and scientifically based harvest guidelines. At the risk of giving the Board other ideas, why weren't shrimp, Pollack, salmon fry or any of the hundreds of other species that serve as an energy source for higher trophic levels also included this proposal? Why specifically pick herring?

It's also interesting that the proposal says that "*Regulations will remain unclear whether the Alaska Board of Fisheries considers Pacific Herring as a forage fish.*" Nothing was unclear at all about the existing regulation. If eliminating public confusion was the goal, that's definitely failed because we're more confused now than before this proposal was generated.

We're confused and concerned about the intent of this proposal. This proposal also states that it will not affect anyone currently participating in commercial herring fisheries. If not, then just what is the purpose for this proposal? Shutting down herring fisheries was implied as the purpose of ACR-1 so, by extension that must also be the implied purpose of proposal 243. That is certainly the obvious assumption in virtually all of the written comments in support of 243.

In conclusion, what this proposal actually seems to be is a thinly veiled action to eventually close commercial herring fisheries in Alaska and the Board should take no action.

Thank you Mr. Chairman.