

SOUTHEAST HERRING CONSERVATION ALLIANCE



P.O. BOX 61
Sitka, Alaska 99835
Tel. No. 907-738-3509

Now I'd like to speak as Executive Director of Southeast Herring Conservation Alliance

Please see on time PC #72

Oppose Proposals 118, 121, 125; Support for Proposal 117, 119, & 122

I like to begin by noting that the Federal Subsistence Board closed a large area to herring fishing in the Makhnati area. Part of the area duplicates the Board of Fish closure in 2012, but the area south of the causeway is additional area. I believe this provides a good basis for the board to rescind the state closed area as provided in Proposal 119. The federal government has chosen to close an area that their own staff recommended against and the state of Alaska opposed.

Please counter the federal over-reach by eliminating the closure north of Makhnati.



The Makhnati Island protected area. Commercial herring harvest will no longer be allowed here, but subsistence and sport fishermen will still have access.

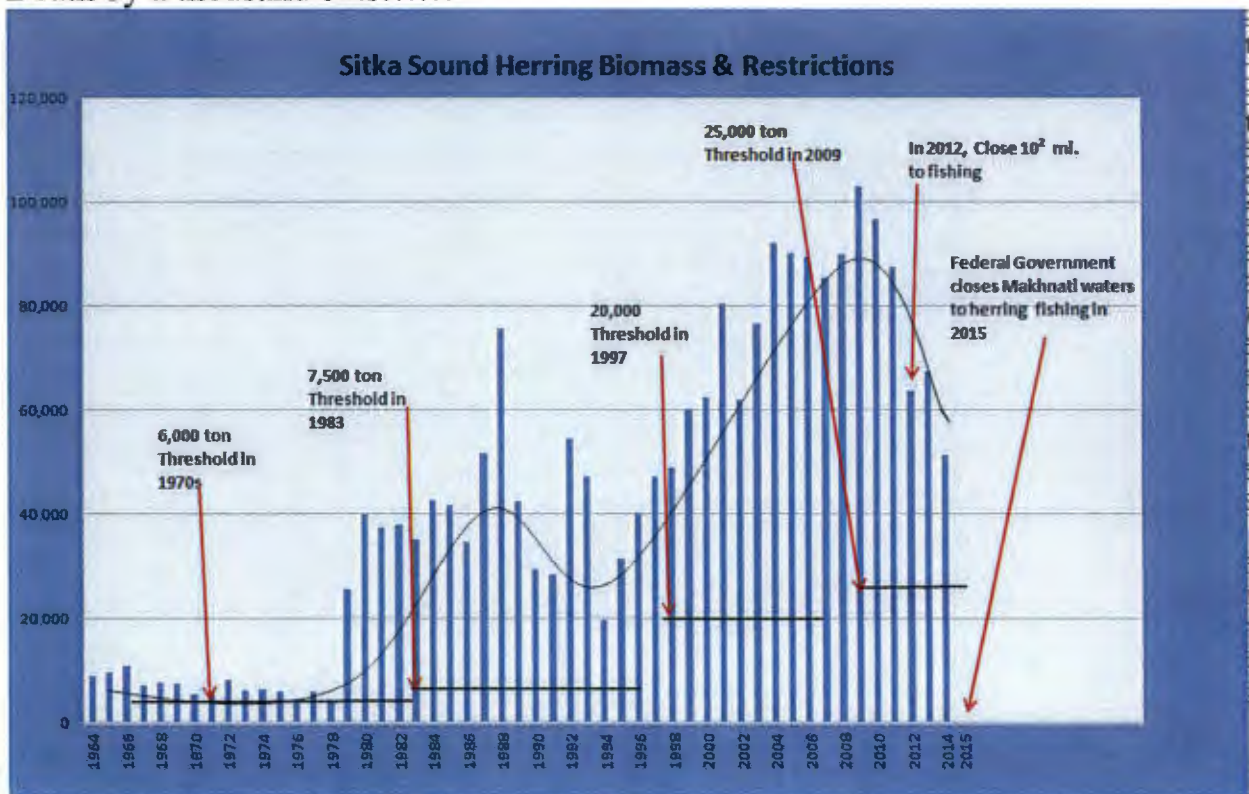
Oppose Proposal 118 – to provide harvest to 50% of annual GHL, and then cease fishing until 25% of forecast spawn miles are realized.

Oppose Proposal 121 – Expand closed area to fishing north to Starrigavin.

Oppose Proposal 125 – change harvest formula from $2 + 8(\text{spawning biomass in tons}/25,000)$ to a maximum harvest rate of 10% with a maximum harvest of 10,000 tons.

Proposals 118, 121, and 125 are simply a continued effort to eliminate the herring fishery. Through the past 50 years the biomass has continued a long and steady increase. Yet as this graph illustrates measures have consistently been adopted to increase the harvest threshold in 1983, in 1997, in 2009. These were not done because there was a crisis or a down turn in biomass but rather to hem in the fishery. In addition to these measures, a 10 square mile area was closed to fishing in 2012. And as I mentioned the federal government closed more area just this year.

Death by a thousand cuts.....



***** These proposals seek to harm the fishery and have no biological merit.

Support 117 – Change ANS in Sitka Sound to reflect true harvest weights. Establish an accounting system for herring egg harvest in Sitka Sound through sampling program.

Support 119 – Eliminate the closed area adopted at the 2012 board of fish meeting

Support 122 – Lower the threshold to harvest to 20,000 tons herring biomass, the 1997 to 2008 regulatory minimum threshold.

A handwritten signature in blue ink, reading "Steve Kiefenstahl". The signature is written in a cursive style with a large, sweeping initial "S".