

# FISHING VESSEL OWNERS' ASSOCIATION INCORPORATED

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Gentlemen:

Please support proposal 236 amending provisions for the Dutch Harbor food and bait herring fishery. This includes an increase to the fisheries' allocation, an elimination of allocation between gear types, and an earlier start date. Lack of effort, particularly from the Togiak gillnet fleet, has consistently stranded fish that could otherwise be harvested by Alaskan fishermen in the Dutch Harbor food and bait herring fishery. While the exploitation rate for the Togiak herring resource is set at 20% of the biomass, the 20-year average actual harvest has been 17.5%. This equates to an average of 2.5%, or approximately 3,350 tons, of stranded fish in the water every year for the past two decades. Recent numbers reflect an even larger amount of stranded fish. The Dutch Harbor food and bait fishery, however, is a fully utilized sector of this fishery, providing a high economic value to the region and a quality product to other local fisheries, as an important bait resource to fishermen using pot and longline gear in Western Alaska. A redistribution of historically unharvested herring to an Alaskan fleet prepared to capture its value and maximize it through other Alaskan fleets meets the needs of the Sustained Yield principle established by Section 8 of the Alaska Constitution.

After a decade of no participation from the Dutch Harbor herring gillnet and a longer history of majorly reduced effort, it makes the most sense to remove the now inapplicable allocation split between the purse seine and gillnet fleets. This will streamline management and allow the current fishery participants to harvest the herring resource more effectively. Additionally, observations on the fishing grounds show herring are arriving to the district earlier. This resulted in a drastic under-harvest in 2016, when the Dutch Harbor fleet was able to capture only 208 tons of the 2,166 allocated. An adjustment to the start date is a necessary shift to continue to harvest effectively while accounting for run timing and other ecological changes we are experiencing in the North Pacific.

The provisions of Proposal 236 will help to ensure that the value of this important resource can be efficiently and consistently captured by Alaskan fishermen, processors, coastal communities and the State.

Fishing Vessel Owners' Association