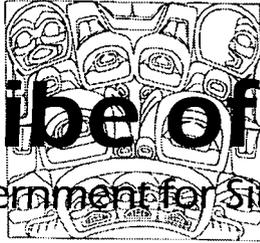


Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



December 1, 2017

Dear Tribal Leader:

I write on behalf of Sitka Tribe of Alaska (STA), tribal government located in Sitka, Alaska with over 4,400 tribal citizens. As a tribal government, STA is responsible for the health, welfare, safety, and culture of its citizens. STA respectfully requests your support in protecting the Sitka Sound herring stock and the subsistence harvest of herring eggs through letters of support for STA herring proposals or if possible through direct oral testimony to the Board of Fisheries (BoF) at its January 2018 meeting being held in Sitka.

STA submitted three BoF proposals to address conservation concerns regarding the Sitka Sound herring population and to protect the subsistence herring egg harvest in the Sound. Although the Alaska Department of Fish and Game (ADF&G) hasn't made the final 2017 post season biomass estimate available to the public yet, comments made by the ADF&G Director of Commercial Fisheries Scott Kelly (as reported on KFSK radio), "that although there were miles and miles of spawn this year it was thinly spread," indicate that the spawning biomass in Sitka Sound fell short of the preseason projections. This same scenario played out in 2012 when only 53% of the 144,000 tons of spawning biomass predicted by ADF&G actually showed up in the Sound

In the last 15 years, subsistence needs (amount necessary for subsistence or ANS) have been met seven times, with needs only being met twice out of the last seven years (2010-2016). STA's subsistence herring egg harvest, under its traditional foods program, has directly experienced these declines. Prior to 2015 STA made an average of 15 sets per year that resulted in a harvest of four to five thousand pounds. Starting in 2015, STA increased its efforts to 21 sets and recorded a harvest of 9,600 pounds of eggs on hemlock branches. Following this trend STA increased its efforts in 2016 and 2017 to 31 and 33 sets respectively. Although there was a significant increase in effort, the results were a decline in harvest that totaled 3,600 (2016) and 1,260 (2017) pounds.

Proposal 99 (Submitted by STA)

This proposal would reduce the current harvest rate from a range of 12-20% to a flat capped harvest rate of 10%. The intent of this proposal is to create a more conservative approach to managing the resource and would result in increased opportunities for subsistence needs to be met. As an example, in 2017 the commercial herring sac roe industry harvest 13,923 tons of herring with an 11.1% roe content, which translates into 3,090,906 pounds of herring sac

roe. This proposal would have left 1,545,453 pounds of herring eggs in the water to mature and hatch, and to help subsistence harvesters meet their needs and achieve the ANS of 137,000 pounds.

Proposal 105 (Submitted by STA)

This proposal would close additional areas to the commercial herring sac roe harvest. These areas are not contiguous with the existing area closed to commercial herring fishing in 2012, known as the core subsistence area. The hope is that if herring reestablish spawning in these traditional areas, the spawn would not be as impacted by the commercial harvest.

Proposal 106 (Submitted by STA)

In 2012 STA submitted a BoF proposal to close an area of Sitka Sound to the commercial sac roe harvest heavily relied upon by subsistence herring egg harvesters. The BoF approved an amendment to the proposal that closed half the area requested to commercial herring harvest. Proposal 106 requests the rest of the area initially asked for in 2012 be closed.

The following proposals were submitted by the Southeast Herring Conservation Alliance (SHCA), which is composed of commercial sac roe permit holders and processors. These proposals are a direct attack on subsistence harvesters and an attempt to roll back the limited success STA has had in protecting the herring stock and the subsistence harvest.

Proposal 94 (Submitted by SHCA)

Prior to 2009 the State had established the ANS at 105,000 to 158,000 pounds of herring eggs. At the 2009 BoF meeting STA was successful in getting the ANS increased to 136,000 to 237,000 pounds to more accurately reflect subsistence needs. If Proposal 94 is approved by the BoF, the ANS would be set at 60,000 to 120,000 pounds. This would mean that if 60,000 pounds of subsistence eggs are harvested and harvesters needs weren't met, they just have to live with it.

Proposal 104 (Submitted by SHCA)

This proposal seeks to eliminate the waters currently closed to commercial sac roe fish for the purposes of protecting the subsistence harvest. STA was successful in getting these waters, known as the core subsistence area, closed to commercial sac roe fishing at the 2012 BoF meeting. The reason behind this closure was to protect herring and allow them to spawn un-harassed by the fishery. If this proposal is approved, the commercial fishery could be prosecuted for fishing in the core subsistence area.

The BoF is on its Southeast meeting cycle and will be in Sitka to review finish proposals January 15 – 24 of 2018. Written comments on BoF proposals are being accepted by the BoF through December 29, 2017. Information on how to submit written comments may be

found at <http://www.adfg.alaska.gov/index.dm?adfg=fisheriesboard.main>. Written comments may also be submitted during the meeting as a "record of comment," or RC. STA would also like to encourage you to attend the meeting in Sitka to provide oral testimony to the Board.

Thank you for any support you may be able to provide to the protection of this most valuable resource. If you have any questions regarding the BoF process, submitting comments to the BoF, the herring BoF proposals, and/or STA's concerns regarding the current management of the Sitka Sound herring stock, contact STA Resource Protection Department Director Jeff Feldpausch at (907)474-7469 or email jeff.feldpausch@sitkatriben-sn.gov.

Sincerely,



Kathy Hope Erickson
Chairman