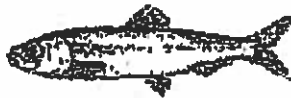


SOUTHEAST HERRING CONSERVATION ALLIANCE

P.O. BOX 61
 Sitka, Alaska 99835
 Tel. No. 907-738-5347

June 11, 2014

Federal Subsistence Board
 Office of the Subsistence Management
 1011 East Tudor Rd., MS 121
 Anchorage, AK 99503
 Email: subsistence@fws.gov

Re: Oppose Proposal FP 15-17

Dear Chairman Towarak and Federal Subsistence Board members,

Southeast Herring Conservation Alliance (SHCA) opposes Proposal FP 15-17 for the reasons outlined below. This proposal requests the closure of the marine waters near Makhnati Island to non-federal users.

In March 2012, the State of Alaska Board of Fish closed an area in Whiting Harbor and near Makhnati Island to commercial fishing in recognition of subsistence users. Half of the area requested in proposal FP 15-17 is now closed due to the 2012 Board of Fish action. In addition, the Alaska Board of Fish closed a much larger area that is contiguous with the Makhnati area requested in FP 15-17. This area delineated in attachment B of the proposer, continues north along Kasiana and Middle Islands, where the vast majority of subsistence herring egg harvest occurs, including the 30,000 to 40,000 pounds collected by SHCA and provided to the community of Sitka each year. The Makhnati area is rarely used for collection of herring eggs on branches and therefore not the true purpose of this proposal.

Contrary to the first point in #3, first paragraph, the Makhnati area is not where herring spawn in many years and closing it could have a detrimental effect on subsistence harvest by shifting fishing effort toward more important and heavily used subsistence harvest beaches. Reasonable opportunity has been demonstrated the past six years when traditional harvesters working with SHCA boats have harvested 20,000 to 70,000 pounds of herring eggs on branches. Greater effort would yield even larger harvests. Harvests beyond 40,000 pounds satiate the demand we have experienced each year at Eliason Harbor in Sitka; the balance of the eggs collected has been transported to outlying communities from Hoonah to Wrangell. Currently ADF&G manages the fishery in such a way to conduct openings away from or outside the 'Core Area' for subsistence and Makhnati is not in the Core Area.

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that is the area where herring have consistently spawned year after year since the 1960s and before. The issue is not the area or the commercial fishery, the issue is low participation. It requires significant effort by many, many participants to harvest over a hundred thousand pounds of herring eggs.

Paragraph 4, "former population levels" There was likely a larger herring population in southeast Alaska one hundred and two hundred years ago. The herring reduction plants (1930s) and high seas foreign fleets (1950s & 60s) were estimated to have taken 130,000 tons annually. Herring populations certainly benefited from industrial whaling in the 18th and 19th centuries when humpbacks and other baleen whales, primary predators, were nearly driven to extinction.

However, we don't manage populations based on their size centuries in the past. Similarly, deer populations continue to have a harvest management plan even though there is good evidence populations were larger prior to logging in the sixties to the eighties. No one is suggesting we cease deer harvest until the old growth returns. Rather, State and Federal managers, manage existing populations on a sustained yield basis. Finally, the Sitka Sound herring population in the mid 1970s was on the order of 5,000 tons and has grown consistently through the years. Currently the population biomass is in the 80,000 ton range or sixteen times the 1970s biomass.

Point 4., paragraph 1 "would only have positive impact on rebuilding the depleted..." The Sitka Sound herring population is not depleted and has shown consistent growth. The ADF&G survey data available in numerous reports, contradict this statement. SHCA's herring eggs on branch harvest data also contradict the statement. Herring eggs have been plentiful in the core area in years when there were commercial harvests (2009 when SHCA collected 70,321 lbs) in the core area and years when there were not (2014 when 41,466 lbs were collected by SHCA).

Point 6., paragraph 1 "impact on sport fishers by increasing prey..." Certainly there is a predator-prey dynamic between herring and Chinook, coho, and halibut. Herring also consume Chinook fry, it goes both ways and generally the State or the Feds do not manage for a single species. To be consistent the proposer might want to consider that sea otters, which Sitka Tribe of Alaska is proposing to kill at a greater harvest rate than current management allows, are responsible for significantly increasing herring spawning habitat in Sitka Sound. The USFWS has called sea otters a keystone species. We believe that is incorrect but the moniker is in their literature. Removal of ocean grazers (urchins in particular) by sea otters in the past twenty years may be contributing to the increase in herring biomass.

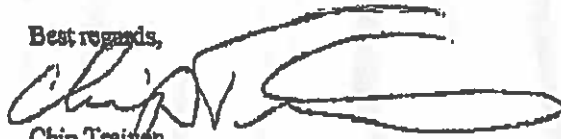
The Sitka Sound herring stock remains healthy and robust, and there is no reason or benefit to preclude the herring fishery from the Makhnati area beyond what is already closed. Subsistence needs are being met as evidenced by delivery of herring eggs to the dock in Sitka during 2009, 2010, 2012, 2013, and 2014; seasons when some 30,000 to 40,000 pounds of weighed and measured herring eggs were provided. Each year eggs were delivered to the dock until community members stopped coming. It is important to note that eggs were provided to supplement what individual harvesters gathered on their own, or to people who could not harvest for themselves. Herring eggs on hemlock branches were distributed to anyone that wanted them and denied to no one.

FP15-17 Written Public Comments

Proposal FP 15-17 is nearly identical to proposal FP 09-05 which has been heard numerous times. We agree with ADF&G's comments of December 2, 2008 and updated on August 31, 2010, pages 122 - 124 in the FSB proposal comment document. No new information has been provided that justifies closing the Makinai Island area; and therefore the proposal should be denied and no changes made to the federal waters.

Please contact me if you have comments or questions.

Best regards,



Chip Traigen,
President SHCA